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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	:	
<i>In re:</i>	:	
	:	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> ,	:	
	:	Case No. 19-23649 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**TWENTY-EIGHTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD JANUARY 1, 2022 THROUGH JANUARY 31, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	January 1, 2022 through January 31, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$744,979.20 (80% of \$931,224.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$25,876.68 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-eighth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing January 1, 2022 through January 31, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$931,224.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$744,979.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$836.31. The blended hourly rate of paraprofessionals during the Application Period is \$280.10.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$25,876.68 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$25,876.68.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$744,979.20 (80% of \$931,224.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$25,876.68 (100%), for a total amount of \$770,855.88 for the Application Period.

Dated: March 17, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	16.2	\$11,044.00
A004	Case Administration	11.1	\$2,382.50
A006	Employment / Fee Applications	2.1	\$609.00
A009	Meetings / Communications with AHC & Creditors	45.6	\$68,240.00
A019	Plan of Reorganization / Disclosure Statement	69.8	\$110,189.00
A020	Insurance Adversary Proceeding	1,172.2	\$738,759.50
		1,317.0	\$931,224.00

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate²	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,800	90.7	\$163,260.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	95.3	\$138,185.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	76.6	\$111,070.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,250	4.1	\$5,125.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850	96.9	\$82,365.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$785	31.6	\$24,806.00
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 U.S. Court of Appeals for the Federal Circuit - 2021	\$775	2.0	\$1,550.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$775	9.9	\$7,672.50

² Gilbert's hourly rates are reviewed from time to time and are subject to periodic adjustment. In the ordinary course of Gilbert's business and in keeping with the firm's established billing procedures, Gilbert adjusted its standard billing rates effective as of January 1, 2022.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate²	Hours Billed for Period	Total Fees for Period
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$700	94.3	\$66,010.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia - 2015	\$710	8.2	\$5,822.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$610	53.5	\$32,635.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	73.9	\$45,079.00
Ethan Kaminsky	Associate / State of New York – 2018	\$560	102.3	\$57,288.00
Christian Carey	Associate / District of Columbia – 2020	\$475	69.8	\$33,155.00
Kristine Hansen	Associate / State of Michigan – 2009 District of Columbia – 2011	\$360	30.6	\$11,016.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	130.3	\$47,559.50
Tarsha Jones	Staff Attorney / State of Maryland 2001 District of Columbia – 2006	\$315	41.0	\$12,915.00
Ifenanya Agwu	Law Clerk	\$200	125.0	\$25,000.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	58.2	\$24,735.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2018	\$375	22.7	\$8,512.50
Stephanie Colcock	Paralegal – Joined firm in 2020	\$350	6.8	\$2,380.00
Lauren Fastenau	Paralegal – Joined firm in 2019	\$325	26.2	\$8,515.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	10.3	\$3,347.50
Katherine Johnson	Paralegal – Joined firm in 2018	\$240	32.3	\$7,752.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$240	9.5	\$2,280.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	12.9	\$2,580.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290	2.1	\$609.00
	Totals		1,317.0	\$931,224.00
	Attorney Blended Rate	\$836.31		
	Paraprofessional Blended Rate	\$280.10		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contracted Professional Fees – eDiscovery Vendor	\$14,245.18
Professional Service Fees – Expert	\$11,631.50
Total	\$25,876.68

Exhibit D

Time and Expense Detail

GILBERT LLP

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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

March 9, 2022
Invoice Number: 11325994
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through January 31, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	931,224.00	25,876.68	957,100.68
Total	931,224.00	25,876.68	957,100.68

TOTAL FEES \$ 931,224.00

TOTAL EXPENSES \$ 25,876.68

TOTAL FEES AND EXPENSES \$ 957,100.68

FOR PROFESSIONAL SERVICES RENDERED through January 31, 2022

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Grim, E.	1/04/22	Confer with team re case status and strategy.	.50	387.50
Wolf, D.	1/04/22	Confer with team re insurance recovery strategy.	.50	387.50
Martinez, S.	1/04/22	Review databases re new insurance-related materials.	.20	65.00
Gaske, A.	1/04/22	Confer with team re strategy and case updates.	.50	305.00
Leveridge, R.	1/04/22	Confer with team re case status (0.5); analyze settlements (0.8).	1.30	1,885.00
Sraders, S.	1/04/22	Confer with team re ongoing matters and strategy for next steps.	.50	305.00
Kaminsky, E.	1/04/22	Confer with team re case status and strategy.	.50	280.00
Wolf, D.	1/10/22	Analyze insurance recovery strategy.	.40	310.00
Shore, R.	1/13/22	Confer with team re pending insurance issues.	.80	1,160.00
Hudson, J.	1/13/22	Confer with team re case status and insurance recovery strategy (partial).	.60	471.00
Girgenti, J.	1/13/22	Confer with team re adversary proceeding and case update.	.80	292.00
Rush, M.	1/13/22	Confer with team re status of insurance and strategy.	.80	560.00
Johnson, K.	1/13/22	Confer with R. Shore, J. Hudson, M. Rush, A. Gaske, R. Leveridge, S. Ogrey, A. Bonesteel, L. Fastenau, A. Farra, C. Carey, S. Sraders, and E. Kaminsky re status and strategy.	.80	192.00
Bonesteel, A.	1/13/22	Confer with team re insurance status and strategy.	.80	300.00
Gaske, A.	1/13/22	Confer with team re insurance strategy and next steps.	.80	488.00
Leveridge, R.	1/13/22	Confer with team re insurance recovery strategy.	.80	1,160.00
Ogrey, S.	1/13/22	Confer with insurance team re status and strategy.	.80	192.00
Fastenau, L.	1/13/22	Confer with team re status and strategy.	.80	260.00
Farra, A.	1/13/22	Confer with team re case update.	.80	568.00
Carey, C.	1/13/22	Confer with team re case status and strategy.	.80	380.00
Sraders, S.	1/13/22	Confer with team re next steps.	.80	488.00
Kaminsky, E.	1/13/22	Confer with team re status and strategy.	.80	448.00

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Name	Date	Services	Hours	Amount
Agwu, I.	1/13/22	Meet with team re case status and strategy.	.80	160.00
Project Total:			16.20	\$ 11,044.00

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	1/07/22	Review and organize pleadings recently filed in the bankruptcy and adversary proceedings.	2.20	440.00
Turner, C.	1/10/22	Review and organize pleadings recently filed in the bankruptcy and adversary proceeding.	2.30	460.00
Turner, C.	1/11/22	Update case calendar.	.30	60.00
Fastenau, L.	1/18/22	Research status of state actions brought cases against Debtors.	1.30	422.50
Turner, C.	1/18/22	Review and organize pleadings recently filed in both the bankruptcy and adversary proceedings.	2.20	440.00
Turner, C.	1/24/22	Review and organize recently filed pleadings in bankruptcy and adversary proceedings.	2.00	400.00
Turner, C.	1/28/22	Update case calendar re deadlines and upcoming hearings.	.80	160.00
Project Total:			11.10	\$ 2,382.50

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	1/03/22	Finalize October fee statement.	.60	174.00
Holland, P.	1/04/22	Communicate with US Trustee and Fee Examiner re October fee statement.	.10	29.00
Holland, P.	1/23/22	Draft November fee statement.	.90	261.00
Holland, P.	1/24/22	Revise November fee statement.	.50	145.00
Project Total:			2.10	\$ 609.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	1/02/22	Confer with AHC re settlement.	1.00	1,800.00
Gilbert, S.	1/04/22	Confer with AHC working group re settlement.	1.00	1,800.00
Gilbert, S.	1/05/22	Confer with AHC re settlement.	1.40	2,520.00
Quinn, K.	1/05/22	Confer with client re status.	1.40	1,750.00

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Name	Date	Services	Hours	Amount
Hudson, J.	1/05/22	Confer with AHC re status and strategy.	1.40	1,099.00
Sraders, S.	1/05/22	Confer with AHC re recent developments and next steps.	1.40	854.00
Gilbert, S.	1/06/22	Confer with AHC working group re settlement.	1.00	1,800.00
Gilbert, S.	1/07/22	Confer with AHC working group re settlement.	1.50	2,700.00
Gilbert, S.	1/10/22	Confer with AHC working group re settlement.	1.50	2,700.00
Gilbert, S.	1/11/22	Confer with AHC working group re settlement.	1.50	2,700.00
Gilbert, S.	1/12/22	Confer with AHC re settlement options.	2.00	3,600.00
Gilbert, S.	1/12/22	Meet with AHC re status.	1.20	2,160.00
Wolf, D.	1/12/22	Confer with clients and co-counsel re bankruptcy and insurance recovery strategy.	1.20	930.00
Sraders, S.	1/12/22	Confer with AHC re recent developments and strategy for next steps.	1.20	732.00
Gilbert, S.	1/13/22	Confer with AHC working group re strategy.	.50	900.00
Gilbert, S.	1/14/22	Confer with J. Rice re settlement issues.	.50	900.00
Gilbert, S.	1/17/22	Confer with AHC representatives re settlement.	1.00	1,800.00
Gilbert, S.	1/17/22	Meet with AHC re status.	1.50	2,700.00
Gilbert, S.	1/18/22	Confer with AHC working group re settlement.	1.00	1,800.00
Gilbert, S.	1/18/22	Confer with AHC representatives re settlement issues.	2.00	3,600.00
Gilbert, S.	1/19/22	Confer with representatives for AHC and nine representatives re settlement.	2.00	3,600.00
Gilbert, S.	1/19/22	Confer with AHC working group re settlement (0.7); meet with AHC re same (1.3).	2.00	3,600.00
Quinn, K.	1/19/22	Confer with client re mediation strategy.	1.30	1,625.00
Shore, R.	1/19/22	Confer with AHC re status, strategy, and next steps re new plan and insurance litigation.	1.30	1,885.00
Hudson, J.	1/19/22	Confer with Committee re status.	1.30	1,020.50
Wolf, D.	1/19/22	Confer with clients and co-counsel re bankruptcy and insurance recovery strategy.	1.30	1,007.50
Sraders, S.	1/19/22	Confer with AHC re current status of bankruptcy and appellate proceedings, including strategy for next steps. (partial)	.80	488.00
Gilbert, S.	1/21/22	Confer with AHC working group and representatives re settlement.	1.50	2,700.00
Hudson, J.	1/21/22	Confer with client representative (J. Conroy) re underlying claims.	.10	78.50
Gilbert, S.	1/25/22	Confer with AHC working group re settlement.	1.00	1,800.00
Gilbert, S.	1/25/22	Confer with J. Rice re settlement.	1.00	1,800.00
Gilbert, S.	1/26/22	Confer with AHC re status.	1.00	1,800.00

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Name	Date	Services	Hours	Amount
Hudson, J.	1/26/22	Attend AHC meeting (portion).	.70	549.50
Wolf, D.	1/26/22	Confer with clients and co-counsel re bankruptcy and insurance recovery strategy.	1.00	775.00
Sraders, S.	1/26/22	Confer with AHC re recent developments and strategy for next steps. (partial)	.60	366.00
Gilbert, S.	1/27/22	Confer with AHC working group re settlement.	1.50	2,700.00
Gilbert, S.	1/28/22	Confer with AHC working group re settlement.	1.00	1,800.00
Gilbert, S.	1/28/22	Confer with AHC representatives and fifteen representatives re settlement.	1.00	1,800.00
Project Total:			45.60	\$ 68,240.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	1/01/22	Confer with counsel for Sacklers re settlement.	1.30	2,340.00
Gilbert, S.	1/01/22	Confer with nine representatives re settlement.	1.00	1,800.00
Gilbert, S.	1/02/22	Confer with fifteen representatives re settlement.	2.50	4,500.00
Gilbert, S.	1/02/22	Confer with K. Eckstein and A. Preis re settlement.	.60	1,080.00
Gilbert, S.	1/03/22	Confer with mediator re settlement.	1.00	1,800.00
Gilbert, S.	1/03/22	Confer with S. Birnbaum re mediation (0.5); confer with fifteen representatives re mediation (0.5).	1.00	1,800.00
Gilbert, S.	1/03/22	Confer with mediator re settlement.	1.00	1,800.00
Gilbert, S.	1/03/22	Analyze status of settlement and mediation.	1.00	1,800.00
Quinn, K.	1/03/22	Analyze case update from Kramer Levin.	.20	250.00
Gilbert, S.	1/04/22	Confer with Sackler counsel re settlement.	1.00	1,800.00
Gilbert, S.	1/04/22	Confer with M. Kesselman re settlement.	.50	900.00
Gilbert, S.	1/04/22	Confer with mediator re settlement.	.50	900.00
Gilbert, S.	1/04/22	Analyze strategy re mediation and settlement.	1.00	1,800.00
Gilbert, S.	1/04/22	Confer with fifteen representatives re settlement (0.8); confer with nine representatives re settlement (0.7).	1.50	2,700.00
Hudson, J.	1/04/22	Review updates re appellate options.	.60	471.00
Grim, E.	1/04/22	Analyze strategy re appeal next steps and Sackler mediation.	.30	232.50
Grim, E.	1/04/22	Review insurance-related plan revisions.	.30	232.50
Rush, M.	1/04/22	Analyze hospital/TPP claims.	.90	630.00
Gilbert, S.	1/05/22	Confer with AHC and fifteen representatives re settlement.	1.50	2,700.00
Gilbert, S.	1/05/22	Confer with Debtors re structures for settlement.	1.50	2,700.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	1/05/22	Confer with Debtors re settlement issues	1.30	2,340.00
Gilbert, S.	1/05/22	Confer with mediator re settlement.	.80	1,440.00
Gilbert, S.	1/06/22	Confer with A. Preis re settlement.	1.00	1,800.00
Gilbert, S.	1/06/22	Analyze settlement.	1.00	1,800.00
Gilbert, S.	1/06/22	Confer with S. Birnbaum re settlement.	.50	900.00
Gilbert, S.	1/06/22	Confer with plaintiffs re settlement.	1.00	1,800.00
Gilbert, S.	1/07/22	Confer with M. Kesselman re settlement.	1.00	1,800.00
Gilbert, S.	1/07/22	Confer with K. Eckstein re settlement.	.50	900.00
Gilbert, S.	1/07/22	Confer with R. Leveridge re settlement issues.	.50	900.00
Gilbert, S.	1/10/22	Analyze settlement issues.	.80	1,440.00
Quinn, K.	1/10/22	Review draft PowerPoint re alternatives (0.4); confer with team re status and strategy (0.5).	.90	1,125.00
Hudson, J.	1/10/22	Review update on strategy discussions following Judge McMahon ruling.	.40	314.00
Hudson, J.	1/10/22	Review Plan B summary provided by co-counsel for insurance implications.	.30	235.50
Grim, E.	1/10/22	Analyze appeal strategy.	.40	310.00
Wolf, D.	1/10/22	Revise slide deck re bankruptcy strategy in light of District Court ruling.	.70	542.50
Gilbert, S.	1/11/22	Confer with Sackler counsel re settlement.	1.50	2,700.00
Gilbert, S.	1/11/22	Confer with financial advisors re settlement options.	2.00	3,600.00
Martinez, S.	1/11/22	Review and organize briefs filed in support of confirmation of plan.	.60	195.00
Gaske, A.	1/11/22	Revise PI TDP claimant chart re appeals process.	.60	366.00
Fastenau, L.	1/11/22	Revise TPP claimant flowchart.	1.10	357.50
Gilbert, S.	1/12/22	Confer with working groups for AHC and fifteen representatives re settlement.	1.00	1,800.00
Gilbert, S.	1/12/22	Attend Court hearing.	2.00	3,600.00
Gaske, A.	1/12/22	Revise PI TDP flowchart.	.50	305.00
Gaske, A.	1/12/22	Review final TDP checklists and flow charts (0.3); confer with L. Fastenau re checklists and flow charts (0.1).	.40	244.00
Fastenau, L.	1/12/22	Revise TPP claimant and PI claimant flowchart.	1.50	487.50
Gilbert, S.	1/13/22	Confer with Debtors re appeal issues.	1.80	3,240.00
Gilbert, S.	1/13/22	Confer with MSGE representatives re settlement.	1.00	1,800.00
Gilbert, S.	1/13/22	Confer with K. Eckstein re strategy.	1.00	1,800.00
Gilbert, S.	1/13/22	Analyze settlement strategy / issues.	.50	900.00
Sraders, S.	1/13/22	Review proposed structures for revised plan of reorganization.	.10	61.00
Gilbert, S.	1/14/22	Confer with R. Leveridge re abatement issues.	.50	900.00

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March 9, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	1/15/22	Analyze private creditor settlement agreements in opioid bankruptcies.	1.10	671.00
Gilbert, S.	1/17/22	Confer with K. Eckstein re settlement issues.	1.00	1,800.00
Gilbert, S.	1/17/22	Confer with M. Kesselman re settlement issues.	1.00	1,800.00
Gilbert, S.	1/18/22	Analyze settlement issues.	.50	900.00
Gilbert, S.	1/18/22	Confer with Sackler counsel re settlement issues.	.80	1,440.00
Gilbert, S.	1/18/22	Confer with nine representatives re settlement.	.50	900.00
Gilbert, S.	1/20/22	Confer with plaintiffs re settlement.	1.00	1,800.00
Gilbert, S.	1/20/22	Confer with M. Kesselman re settlement.	1.30	2,340.00
Gilbert, S.	1/20/22	Confer with A. Preis re settlement issues.	1.50	2,700.00
Gilbert, S.	1/21/22	Confer with MSGE re settlement issues.	1.50	2,700.00
Gilbert, S.	1/24/22	Attend Financial Advisors presentation to AHC and fifteen representatives re cash flow.	1.50	2,700.00
Gilbert, S.	1/24/22	Confer with Debtors' counsel (Davis Polk) re plan issues.	.50	900.00
Quinn, K.	1/24/22	Analyze status of appeal and strategy.	.30	375.00
Hudson, J.	1/24/22	Review strategy options following SDNY ruling.	.10	78.50
Grim, E.	1/24/22	Review status of appeal and affect on insurance recovery strategy.	.30	232.50
Gilbert, S.	1/25/22	Confer with NAS re settlement.	.50	900.00
Gilbert, S.	1/25/22	Confer with A. Preis re settlement.	1.50	2,700.00
Gilbert, S.	1/26/22	Confer with representatives for AHC and fifteen representatives re settlement.	1.00	1,800.00
Rush, M.	1/26/22	Research re Plan B.	1.60	1,120.00
Gilbert, S.	1/28/22	Confer with Debtors' counsel (Davis Polk) re mediation.	.50	900.00
Gilbert, S.	1/28/22	Confer with financial advisors re financial issues.	.50	900.00
Gilbert, S.	1/28/22	Confer with B. Kelly re trusts issues.	.40	720.00
Gilbert, S.	1/29/22	Confer with mediator.	.50	900.00
Gilbert, S.	1/29/22	Confer with S. Birnbaum re settlement.	.50	900.00
Gilbert, S.	1/30/22	Confer with S. Birnbaum re settlement.	.50	900.00
Gilbert, S.	1/30/22	Confer with J. Peacock re settlement.	.50	900.00
Gilbert, S.	1/30/22	Confer with J. Rice re settlement.	.50	900.00
Gilbert, S.	1/30/22	Confer with K. Eckstein re settlement.	.50	900.00
Gilbert, S.	1/31/22	Analyze settlement issues.	1.00	1,800.00
Hudson, J.	1/31/22	Review summary of issues on appeal to Second Circuit.	.10	78.50
Hudson, J.	1/31/22	Communicate with team re appeal status.	.10	78.50
Grim, E.	1/31/22	Review status of Sackler mediation and appeal.	.20	155.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/31/22	Communicate with S. Martinez re developments in legislation re non-debtor releases.	.10	61.00
Project Total:			69.80	\$ 110,189.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Gaske, A.	1/01/22	Revise potential motion on Issue #27 to incorporate comments from R. Shore, J. Hudson, J. Rubinstein, and R. Leveridge.	1.80	1,098.00
Gaske, A.	1/02/22	Continue revising potential motion on Issue #27 to incorporate comments from R. Shore, R. Leveridge, J. Hudson, and J. Rubinstein.	4.80	2,928.00
Shore, R.	1/03/22	Confer with team re brief on Issue #27.	.90	1,305.00
Hudson, J.	1/03/22	Analyze next steps for potential motion for summary judgment.	.90	706.50
Girgenti, J.	1/03/22	Analyze insurance policies for provisions and clauses related to potential motion on Issue #27 (3.6); review and tag documents for privilege responsive to defendants' request for production of documents (3.2).	6.80	2,482.00
Girgenti, J.	1/03/22	Draft spreadsheet re provisions and clauses related to potential motion on Issue #27.	1.30	474.50
Rubinstein, J.	1/03/22	Review proposed edits/comments to motion re Issue #27 (0.9); confer with R. Leveridge re motion strategy (0.5); confer with team re Issue #27 motion (0.9).	2.30	1,955.00
Rush, M.	1/03/22	Review potential summary judgment motion re Issue #27.	2.70	1,890.00
Rush, M.	1/03/22	Confer with team re potential summary judgment motion re Issue #27.	.90	630.00
Martinez, S.	1/03/22	Review correspondence database re National Union correspondence.	.60	195.00
Gaske, A.	1/03/22	Revise exhibit to potential motion on Issue #27 re list of certain policy provisions.	1.60	976.00
Gaske, A.	1/03/22	Confer with R. Shore, R. Leveridge, J. Hudson, M. Rush, and J. Rubinstein re edits on potential motion on Issue #27.	.90	549.00
Gaske, A.	1/03/22	Communicate with C. Carey and J. Girgenti re review policies for certain provision discussed in potential motion on Issue #27.	.30	183.00
Gaske, A.	1/03/22	Revise potential motion on Issue #27 to incorporate comments from M. Rush and other edits.	1.20	732.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	1/03/22	Review and provide comments to brief (3.3); confer with team re same (0.9).	4.20	6,090.00
Carey, C.	1/03/22	Analyze Issue #27 review materials re prospective motion practice.	3.40	1,615.00
Carey, C.	1/03/22	Analyze Issue #27 policy review chart.	.70	332.50
Carey, C.	1/03/22	Research Issue #32 background materials.	2.10	997.50
Sraders, S.	1/03/22	Review J. Rubinstein comments to draft follow-up letter to XLIA, Zurich, and NAE/Aspen re meet-and-confers.	.10	61.00
Colcock, S.	1/03/22	Organize correspondence on insurance research tasks.	.50	175.00
Kaminsky, E.	1/03/22	Draft requests for admissions.	1.40	784.00
Kaminsky, E.	1/03/22	Review documents for privilege in preparation for production to insurers.	4.40	2,464.00
Shore, R.	1/04/22	Review and provide comments on letter to Zurich re discovery issues (0.4); review summary judgment brief re Issue #27 (0.7); review summary judgment brief on Issue #14 (0.4).	1.50	2,175.00
Girgenti, J.	1/04/22	Continue analyzing insurance policies for provisions and clauses related to potential motion on Issue #27 (2.8); continue tagging documents for privilege responsive to defendants' request for production of documents (4.1).	6.90	2,518.50
Girgenti, J.	1/04/22	Revise spreadsheet re provisions and clauses related to potential motion on Issue #27.	1.10	401.50
Rubinstein, J.	1/04/22	Provide comments to motion re Issue #20 (3.1); review edits to Zurich meet-and-confer letter (0.2); review correspondence from XL counsel providing supplemental production (0.1); revise discovery letter in response to Navigator's letter of December 16 (0.4).	3.80	3,230.00
Rush, M.	1/04/22	Review research re Issue #1.	.50	350.00
Rush, M.	1/04/22	Review potential summary judgment brief re Issue #20.	1.50	1,050.00
Gaske, A.	1/04/22	Revise potential motion on Issue #27 re legal analysis sections.	2.50	1,525.00
Gaske, A.	1/04/22	Revise potential motion on Issue #27 re factual background.	3.90	2,379.00
Leveridge, R.	1/04/22	Review updated brief on Issue #27 (1.2); review updated brief on Issue #14 (0.8); correspond with co-counsel re discovery issues (0.4).	2.40	3,480.00
Farra, A.	1/04/22	Draft responses re defendants' contention interrogatories.	.50	355.00

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Name	Date	Services	Hours	Amount
Carey, C.	1/04/22	Analyze Issue #27 policy review chart.	1.20	570.00
Carey, C.	1/04/22	Analyze Issue #32 background materials.	2.70	1,282.50
Sraders, S.	1/04/22	Confer with E. Kaminsky re research for legal issues memoranda.	.40	244.00
Sraders, S.	1/04/22	Revise draft letter to Zurich to incorporate comments from R. Shore.	1.00	610.00
Kaminsky, E.	1/04/22	Confer with S. Sraders re research for issue memoranda.	.40	224.00
Kaminsky, E.	1/04/22	Review documents for privilege in preparation for production to insurers.	3.60	2,016.00
Shore, R.	1/05/22	Analyze discovery and litigation issues.	1.00	1,450.00
Hudson, J.	1/05/22	Review and provide comments on potential motion for summary judgment.	2.20	1,727.00
Hudson, J.	1/05/22	Communicate with team re status of document review.	.20	157.00
Girgenti, J.	1/05/22	Continue reviewing and tagging documents for privilege that are responsive to defendants' requests for production.	2.40	876.00
Rubinstein, J.	1/05/22	Revise current version of motion re Issue #27 (2.8); review proposed edits of others re same (0.5); provide additional edits to discovery letter to Navigators (0.2); analysis of underlying claims as relate to motions practice (0.6); update litigation task list (0.6); review certain documents produced by Navigators re discovery issues (0.3).	5.00	4,250.00
Rush, M.	1/05/22	Analyze third-party payor claims.	3.50	2,450.00
Rush, M.	1/05/22	Review potential summary judgment brief re Issue #20.	2.10	1,470.00
Bonesteel, A.	1/05/22	Review and update document review database with Otterbourg emails.	.70	262.50
Gaske, A.	1/05/22	Draft portion of statement of undisputed facts and accompanying declaration re potential motion on Issue #27.	2.60	1,586.00
Gaske, A.	1/05/22	Review Local Bankruptcy Court Rules, District Court Rules, and Judge's rules re submissions for motions for summary judgment.	.90	549.00
Gaske, A.	1/05/22	Review additional comments from J. Rubinstein, M. Rush, and J. Hudson re potential motion on Issue #27.	.40	244.00
Leveridge, R.	1/05/22	Review update brief re Issue #27 (2.2); review updated brief on Issue #14 (1.8); review status of discovery (0.3); communicate with co-counsel re litigation projects (0.3).	4.60	6,670.00

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Name	Date	Services	Hours	Amount
Carey, C.	1/05/22	Analyze expert materials re Issue #32 background research.	3.10	1,472.50
Carey, C.	1/05/22	Revise chart re Issue #32 background research.	.80	380.00
Carey, C.	1/05/22	Draft summary re Issue #32 background research.	1.90	902.50
Sraders, S.	1/05/22	Communicate with E. Kaminsky re requests for admission.	.30	183.00
Sraders, S.	1/05/22	Revise NAE/Aspen letter to incorporate comments from J. Rubinstein.	.50	305.00
Sraders, S.	1/05/22	Revise XLIA letter to incorporate comments from J. Rubinstein.	.30	183.00
Sraders, S.	1/05/22	Research re Issue #59.	.30	183.00
Kaminsky, E.	1/05/22	Review documents for privilege in preparation for production to insurers.	2.50	1,400.00
Kaminsky, E.	1/05/22	Draft requests for admissions.	1.80	1,008.00
Shore, R.	1/06/22	Confer with J. Rubinstein and R. Leveridge re litigation strategy.	.50	725.00
Shore, R.	1/06/22	Confer with team re litigation status and strategy.	.90	1,305.00
Shore, R.	1/06/22	Confer with UCC counsel and Debtors' counsel re potential motions on Issues #14 and #27.	.40	580.00
Shore, R.	1/06/22	Review and revise discovery responses.	1.00	1,450.00
Girgenti, J.	1/06/22	Confer with team re adversary proceeding status and strategy.	.90	328.50
Girgenti, J.	1/06/22	Continue reviewing documents responsive to defendants' request for production of documents.	3.80	1,387.00
Rubinstein, J.	1/06/22	Revise litigation strategy outline (0.4); provide comments re motion re Issue #14 (0.6); analysis re supplementation of discovery responses (0.4); review R. Shore proposed edits to discovery correspondence (0.5); review update re Committee discovery review status (0.2); confer with team re strategy (0.9); confer with Debtors' and UCC counsel re strategy (0.4); confer with R. Shore and R. Leveridge re same (0.5).	3.90	3,315.00
Rush, M.	1/06/22	Revise motion for summary judgment re Issue #14.	2.90	2,030.00
Rush, M.	1/06/22	Review discovery letters.	1.00	700.00
Rush, M.	1/06/22	Confer with team re adversary proceeding status.	.90	630.00
Rush, M.	1/06/22	Communications with co-counsel re Issue #20.	.20	140.00
Rush, M.	1/06/22	Draft supporting documents for motion for summary judgment re Issue #14.	.80	560.00
Rush, M.	1/06/22	Confer with co-counsel re case status and strategy.	.50	350.00

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Name	Date	Services	Hours	Amount
Martinez, S.	1/06/22	Confer with M. Rush, J. Rubinstein, A. Farra, R. Shore, J. Girgenti, E. Kaminsky, A. Bonesteel, S. Sradars, A. Gaske, S. Ogrey, and K. Johnson re status and strategy. re case strategy and updates.	.90	292.50
Johnson, K.	1/06/22	Communicate with E. Kaminsky re issues list correspondence with Insurer #24.	.30	72.00
Johnson, K.	1/06/22	Revise policy chart.	3.00	720.00
Johnson, K.	1/06/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, S. Sradars, C. Carey, E. Kaminsky, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, S. Ogrey, S Martinez, and B. Hubbard re status and strategy.	.90	216.00
Johnson, K.	1/06/22	Review and revise master objection document re discovery responses.	.50	120.00
Bonesteel, A.	1/06/22	Confer with team re litigation status.	.90	337.50
Bonesteel, A.	1/06/22	Review and organize recently received insurer productions.	1.60	600.00
Gaske, A.	1/06/22	Revise potential motion re Issue #27 to incorporate additional comments from J. Rubinstein, M. Rush, R. Leveridge, and J. Hudson.	2.80	1,708.00
Gaske, A.	1/06/22	Confer with litigation team re strategy and next steps.	.90	549.00
Gaske, A.	1/06/22	Draft bullet points of unresolved comments for potential motion on Issue #27.	.80	488.00
Gaske, A.	1/06/22	Confer with UCC counsel, Debtors' counsel, R. Leveridge, R. Shore, J. Rubinstein, and M. Rush re potential motions on Issues #14 and #27.	.40	244.00
Leveridge, R.	1/06/22	Review current draft of brief on Issue #14 (1.6); review current draft of brief on Issue #27 (2.4); communications with co-plaintiffs re same (0.4); confer with co-counsel re briefs and TIG arbitration (0.4).	4.80	6,960.00
Leveridge, R.	1/06/22	Confer with team re litigation status and strategy.	.90	1,305.00
Ogrey, S.	1/06/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, S. Sradars, E. Kaminsky, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, S. Ogrey, S Martinez, and B. Hubbard re status and strategy.	.90	216.00
Farra, A.	1/06/22	Review coverage chart.	.10	71.00
Farra, A.	1/06/22	Confer with team re litigation and bankruptcy status update.	.90	639.00
Carey, C.	1/06/22	Confer with team re case status and strategy.	.90	427.50
Carey, C.	1/06/22	Analyze Issue #32 background materials.	2.90	1,377.50

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Name	Date	Services	Hours	Amount
Sraders, S.	1/06/22	Review M. Rush edits to NAE/Aspen and XLIA letters.	.30	183.00
Sraders, S.	1/06/22	Confer with team re ongoing matters and strategy for next steps.	.90	549.00
Sraders, S.	1/06/22	Review chart re Issue #58.	.60	366.00
Sraders, S.	1/06/22	Revise draft letters to insurers from meet-and-confer to address R. Shore comments.	2.80	1,708.00
Sraders, S.	1/06/22	Review correspondence from C. Sorenson re Navigators productions.	.20	122.00
Kaminsky, E.	1/06/22	Confer with team re status and strategy.	.90	504.00
Kaminsky, E.	1/06/22	Revise requests for admissions.	.90	504.00
Kaminsky, E.	1/06/22	Continue reviewing documents responsive to insurers request for production for privilege.	1.80	1,008.00
Hubbard, B.	1/06/22	Review opioid drug research for brief re Issue #27.	1.20	510.00
Hubbard, B.	1/06/22	Meet with M. Rush, J. Rubinstein, A. Farra, R. Leveridge, C. Carey, J. Girgenti, E. Kaminsky, A. Bonesteel, I. Agwu, R. Shore, A. Gaske, S. Ogrey, S. Sraders and K. Johnson re status and strategy.	.90	382.50
Hubbard, B.	1/06/22	Drafts notes and questions re allocations for Debtors' insurance.	.70	297.50
Agwu, I.	1/06/22	Meet with team re case update.	.90	180.00
Shore, R.	1/07/22	Review and revise letter to Navigators re discovery.	.70	1,015.00
Hudson, J.	1/07/22	Analyze next steps for responding to defensive discovery.	.10	78.50
Girgenti, J.	1/07/22	Review and tag for privilege documents responsive to defendants' request for production of documents.	4.10	1,496.50
Rubinstein, J.	1/07/22	Review status of pending pleadings (0.7); review update re document review in response to discovery served on Committee (0.4); review M. Rush questions re motion re Issue #14 (0.5); review January 6 discovery letter from Navigators (0.3); review proposed edits to response to Navigators' December 16 discovery letter and provide comments to co-plaintiff counsel (0.4); confer with R. Shore and R. Leveridge re strategy (1.1); review policy evidence as relates to policy stipulation project (0.3).	3.70	3,145.00
Rush, M.	1/07/22	Review supporting documents for summary motion re Issue #14.	2.70	1,890.00
Rush, M.	1/07/22	Review letter from Navigators re discovery.	.40	280.00
Johnson, K.	1/07/22	Review and revise master document re discovery responses.	1.80	432.00
Johnson, K.	1/07/22	Review and organize incoming discovery pleadings.	.30	72.00

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Name	Date	Services	Hours	Amount
Gaske, A.	1/07/22	Review communication and information re exhibits to potential motions on Issue #27 and #14.	.30	183.00
Gaske, A.	1/07/22	Review certain policies to confirm whether policies were previously viewed as missing.	.30	183.00
Leveridge, R.	1/07/22	Confer with R. Shore and J. Rubinstein re discovery and motions practice strategy (1.1), communicate with other plaintiffs re same (2.2); review District Court approving Debtors' motion for interlocutory appeal (0.4).	3.70	5,365.00
Farra, A.	1/07/22	Review status of document / privilege review.	.40	284.00
Carey, C.	1/07/22	Review production requests and mediation materials re privilege review.	3.00	1,425.00
Carey, C.	1/07/22	Research additional Issue #32 background materials.	1.70	807.50
Sraders, S.	1/07/22	Draft response to C. Sorensen letter from Navigators.	1.30	793.00
Kaminsky, E.	1/07/22	Review documents for privilege in response to request for production of documents.	1.40	784.00
Kaminsky, E.	1/07/22	Review policies for memorandum re Issue #25.	.60	336.00
Agwu, I.	1/07/22	Review documents for privilege for production.	2.50	500.00
Rubinstein, J.	1/09/22	Review January 7 Navigators letter to Court re discovery of invoice descriptions (0.8); communicate with team re document production review process re discovery served on Committees (0.2); confer with Debtors' counsel re response letter to Court (0.6) revise response letter to Navigators December 16 letter (0.4).	2.00	1,700.00
Leveridge, R.	1/09/22	Review and revise letter to Navigators (1.1); confer with Debtors' counsel re same (0.6).	1.70	2,465.00
Shore, R.	1/10/22	Confer with team re pending issues (0.8); confer with UCC counsel re comments on brief re Issue #27 (0.9); revise same (1.1); review and revise letter to Judge Drain re discovery disputes (0.4); review Rite-Aid decision (0.9); review brief on Issue #27 (0.6).	4.70	6,815.00
Hudson, J.	1/10/22	Review analysis of non-Purdue opioid drugs.	.50	392.50
Hudson, J.	1/10/22	Outline basis and process for categorical logging in response to discovery requests on AHC.	.60	471.00
Girgenti, J.	1/10/22	Confer with E. Kaminsky, I. Agwu, and C. Carey re privilege review project.	.50	182.50
Girgenti, J.	1/10/22	Continue review of documents for privilege which are responsive to defendants' request for production of documents (5.8); review and analyze supplemental XL production (1.3).	7.10	2,591.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/10/22	Revise letter to Court re Rhodes defense invoices and response to Navigators letter (1.2); analysis re motion strategy (1.1); confer with J. Hudson and E. Kaminsky re privilege logging (0.3); confer with UCC counsel, R. Leveridge, R. Shore, and A. Gaske re motion re Issue #27 (0.9); confer with R. Shore, R. Leveridge, and A. Gaske re Issue #27 (0.8); communicate with team re relevant judicial decisions re Issue #14 (0.4).	4.70	3,995.00
Wolf, D.	1/10/22	Review and revise summary judgment motion re issue #16.	1.90	1,472.50
Rush, M.	1/10/22	Analyze supporting documents for motion for summary judgment re Issue #14.	1.80	1,260.00
Rush, M.	1/10/22	Review draft response to Navigators' letter to Court.	.20	140.00
Rush, M.	1/10/22	Review case law re Issue #14.	1.70	1,190.00
Rush, M.	1/10/22	Review draft letter to Navigators re discovery issues.	.70	490.00
Rush, M.	1/10/22	Review letters to insurers re discovery issues.	1.10	770.00
Bonesteel, A.	1/10/22	Confer with document vendor re document review protocol.	.60	225.00
Bonesteel, A.	1/10/22	Review and update production log.	2.90	1,087.50
Gaske, A.	1/10/22	Review recently issued insurance coverage opinion re coverage of governmental claims.	.70	427.00
Gaske, A.	1/10/22	Review order granting interlocutory appeal.	.10	61.00
Gaske, A.	1/10/22	Confer with UCC counsel, R. Shore, R. Leveridge, and J. Rubinstein re comments on potential motion of Issue #27.	.90	549.00
Gaske, A.	1/10/22	Confer with R. Leveridge, J. Rubinstein, and R. Shore re incorporating comments from UCC into potential motion on Issue #27.	.80	488.00
Leveridge, R.	1/10/22	Confer with team re strategy for motions practice (0.8); review and revise draft letter to Court re Navigators' discovery issue (2.7); confer with UCC counsel re motions practice (0.9); review coverage opinion from Delaware Supreme Court (1.4).	5.80	8,410.00
Fastenau, L.	1/10/22	Organize most recent PPLC claim reports for attorney review.	.20	65.00
Fastenau, L.	1/10/22	Confer with B. Hubbard re drug manufacturer opioids research tracking.	.50	162.50
Fastenau, L.	1/10/22	Research opioid drug manufacturers and products they produce.	2.20	715.00
Fastenau, L.	1/10/22	Research Cardinal Health.	.40	130.00
Farra, A.	1/10/22	Analyze research re opioid coverage issue.	.50	355.00

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Name	Date	Services	Hours	Amount
Farra, A.	1/10/22	Analyze document production issues.	.70	497.00
Farra, A.	1/10/22	Confer with Cobra, E. Kaminsky, and A. Bonesteel re document review status.	.40	284.00
Carey, C.	1/10/22	Revise Issue #32 background research summary re next steps.	.70	332.50
Carey, C.	1/10/22	Confer with E. Kaminsky, I. Agwu, and J. Girgenti re insurer production review and next steps.	.50	237.50
Carey, C.	1/10/22	Research additional Issue #32 background materials.	2.90	1,377.50
Carey, C.	1/10/22	Review insurer production materials re privilege and confidentiality.	1.70	807.50
Sraders, S.	1/10/22	Confer with team re recent developments and strategy for next steps.	.40	244.00
Sraders, S.	1/10/22	Draft response to C. Sorensen January 6 letter.	1.50	915.00
Sraders, S.	1/10/22	Revise draft letter to Navigators to incorporate comments from M. Rush.	.70	427.00
Sraders, S.	1/10/22	Review memoranda and case law re Issue #19 (1.0); review M. Rush comments to draft letters to insurers (0.1).	1.10	671.00
Kaminsky, E.	1/10/22	Confer with C. Carey, I. Agwu, and J. Girgenti re privilege review strategy.	.50	280.00
Kaminsky, E.	1/10/22	Confer with document vendor re document review.	.60	336.00
Kaminsky, E.	1/10/22	Analyze status of defensive discovery and strategy.	.90	504.00
Kaminsky, E.	1/10/22	Review documents for production re privilege and relevance.	3.80	2,128.00
Hubbard, B.	1/10/22	Confer with L. Fastenau re opioid manufacturer research.	.50	212.50
Agwu, I.	1/10/22	Confer with E. Kaminsky, C. Carey and J. Girgenti re privilege review of documents for production to Liberty Mutual.	.60	120.00
Agwu, I.	1/10/22	Conduct privilege review of documents for production to Liberty Mutual.	5.90	1,180.00
Agwu, I.	1/10/22	Review recent Rite Aid decision to update memorandum re opioid-related litigation.	1.50	300.00
Shore, R.	1/11/22	Analyze key issues re Rite-Aid and Actavis.	1.00	1,450.00
Shore, R.	1/11/22	Confer with Debtors' counsel, J. Rubinstein, and R. Leveridge re Navigators defense cost issue.	1.20	1,740.00
Shore, R.	1/11/22	Confer with D. Wolf, R. Leveridge, J. Rubinstein, and M. Rush re summary judgment motion re issue #16.	1.00	1,450.00
Hudson, J.	1/11/22	Analyze impact of Rite Aid ruling on potential motions.	1.00	785.00

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Hudson, J.	1/11/22	Confer with PI counsel (S. Higgins) re recent opioid coverage ruling.	.10	78.50
Girgenti, J.	1/11/22	Continue review of documents for privilege.	7.60	2,774.00
Rubinstein, J.	1/11/22	Review Rite Aid decision out of Delaware Supreme Court and related opinions (2.3); confer with Debtors' counsel, R. Shore, and R. Leveridge re Navigators defense cost issue (1.2); review correspondence from TIG counsel re arbitration and analyze potential response (0.3); review correspondence from J. Hudson re defensive discovery privilege logs (0.1); review order granting certification of appealability (0.2); revise response to Navigators January 6 letter re discovery (0.6); confer with team re Rite Aid decision (1.0); revise XL and Zurich discovery response letters (0.3).	6.00	5,100.00
Wolf, D.	1/11/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, and M. Rush re summary judgment motion re issue #27.	1.00	775.00
Wolf, D.	1/11/22	Revise summary judgment motion re Issue #27.	1.20	930.00
Rush, M.	1/11/22	Analyze case law re Issue #14.	4.30	3,010.00
Rush, M.	1/11/22	Confer with team re case developments related to Issue #14.	1.00	700.00
Johnson, K.	1/11/22	Review and revise discovery responses tracking document.	2.40	576.00
Bonesteel, A.	1/11/22	Update production log.	2.70	1,012.50
Gaske, A.	1/11/22	Review protective orders re using produced documents.	.40	244.00
Gaske, A.	1/11/22	Research certain language in policies in New York and Connecticut re potential motion on Issue #27.	.90	549.00
Leveridge, R.	1/11/22	Confer with team re Rite Aid decision (1.0); review M. Rush analysis of same (1.9).	2.90	4,205.00
Leveridge, R.	1/11/22	Confer with Debtors' counsel re discovery dispute over defense invoices (1.2); review communications from Court, co-counsel and insurer counsel re same (1.2).	2.40	3,480.00
Leveridge, R.	1/11/22	Review communications from TIG and Debtors' counsel re insurance coverage matter.	.60	870.00
Fastenau, L.	1/11/22	Review and revise MDL experts research project.	3.90	1,267.50
Carey, C.	1/11/22	Analyze background research and chart re Issue #32.	1.20	570.00
Carey, C.	1/11/22	Continue review of insurer production materials for privilege and confidentiality.	1.80	855.00
Sraders, S.	1/11/22	Analyze Rite Aid decision.	.80	488.00

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Sraders, S.	1/11/22	Revise draft response to Navigators January 6 letter to incorporate comments from J. Rubinstein.	.50	305.00
Sraders, S.	1/11/22	Research re Issue #59.	1.30	793.00
Kaminsky, E.	1/11/22	Continue review of documents for privilege and responsive to insurer request for production.	2.70	1,512.00
Hubbard, B.	1/11/22	Drafts questions for allocation of opioid claims to insurance coverage.	2.80	1,190.00
Agwu, I.	1/11/22	Continue review of documents for privilege for production to Liberty Mutual.	3.50	700.00
Agwu, I.	1/11/22	Continue reviewing recent Rite Aid decision to update memorandum re opioid-related litigation.	1.50	300.00
Shore, R.	1/12/22	Attend omnibus hearing (1.7); review and comment on note re Rite-Aid decision (1.1); review and revise note to TIG (0.6); confer with team re claim analysis (1.1).	4.50	6,525.00
Girgenti, J.	1/12/22	Continue review of documents for privilege responsive to defendants' request for production of documents (4.8); review policy provisions in at-issue policies re governmental entity coverage (2.4).	7.20	2,628.00
Girgenti, J.	1/12/22	Draft insurance summary re review of XL insurance production.	.40	146.00
Rubinstein, J.	1/12/22	Correspond with co-plaintiffs' counsel re response to National Union discovery correspondence (0.8); analysis re Rite Aid decision (1.5); communicate with co-plaintiff counsel re response to TIG re arbitration (0.9); confer with team re claim analysis (1.1); review Debtors' production letter (0.1); analysis re exhibit to motion re Issue #14 (0.5); review note to Court re resolution of Navigators discovery issue (0.1); review A. Gaske analysis re protective order (0.1); review co-plaintiff comments re discovery letters to Zurich, NAE, and XLIC (0.2).	5.30	4,505.00
Rush, M.	1/12/22	Revise summary judgment brief re Issue #14.	2.50	1,750.00
Rush, M.	1/12/22	Review discovery letters to insurers.	.50	350.00
Rush, M.	1/12/22	Review claims memorandum.	.50	350.00
Rush, M.	1/12/22	Research issues for summary judgment brief re Issue #14.	1.90	1,330.00
Rush, M.	1/12/22	Confer with team re claims issues.	1.10	770.00
Johnson, K.	1/12/22	Correspond with S. Sraders and A. Bonesteel re insurer discovery dates.	.20	48.00
Johnson, K.	1/12/22	Correspond with A. Gaske re motion to file under seal filing procedures.	.60	144.00
Bonesteel, A.	1/12/22	Update production log.	1.00	375.00

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Name	Date	Services	Hours	Amount
Gaske, A.	1/12/22	Review expert reports for inclusion in potential motion re Issue #27.	.60	366.00
Gaske, A.	1/12/22	Research interpretation of certain term in insurance policy re potential motion on Issue #27.	1.30	793.00
Gaske, A.	1/12/22	Analyze protective order re processes for including produced documents in potential motions.	.90	549.00
Gaske, A.	1/12/22	Review certain policies for inclusion in policy comparison chart re policy stipulation project.	.50	305.00
Gaske, A.	1/12/22	Review which insurers asserted affirmative defense on certain issue.	.60	366.00
Leveridge, R.	1/12/22	Confer with team re claims data (1.1); review use of same in adversary proceeding (0.5).	1.60	2,320.00
Leveridge, R.	1/12/22	Communications with coverage counsel for other opioid defendants re status of appellate cases involving coverage claims.	1.20	1,740.00
Leveridge, R.	1/12/22	Communications with Debtors' counsel re response to TIG.	1.40	2,030.00
Leveridge, R.	1/12/22	Draft communications to AHC re Rite Aid decision.	1.60	2,320.00
Leveridge, R.	1/12/22	Analyze status of offensive discovery.	.30	435.00
Leveridge, R.	1/12/22	Review letter from insurance counsel re defensive discovery; communication with Debtors' counsel re same.	.40	580.00
Fastenau, L.	1/12/22	Review and revise MDL experts research project.	2.70	877.50
Carey, C.	1/12/22	Analyze case status and strategy re Issue #32 background research.	.70	332.50
Carey, C.	1/12/22	Review insurer production materials re privilege and confidentiality.	4.20	1,995.00
Sraders, S.	1/12/22	Review analysis of Ninth Circuit case re opioid insurance coverage.	.10	61.00
Sraders, S.	1/12/22	Revise draft response to Navigators January 6 letter.	.30	183.00
Sraders, S.	1/12/22	Revise draft letters to XLIA and Zurich.	1.10	671.00
Sraders, S.	1/12/22	Confer with J. Rubinstein, R. Shore, R. Leveridge, M. Rush, and B. Hubbard re Issue #56.	1.10	671.00
Sraders, S.	1/12/22	Review memoranda re Issue #56.	.40	244.00
Kaminsky, E.	1/12/22	Review documents for privilege in preparation for production.	4.20	2,352.00
Kaminsky, E.	1/12/22	Review policies re Issue #25.	.40	224.00
Hubbard, B.	1/12/22	Meet with S. Sraders, M. Rush, J. Rubinstein, and R. Shore re allocation methodology questions.	1.10	467.50

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Hubbard, B.	1/12/22	Review opioid allocation methodology questions (0.7); review batch notices (0.4); review overview of third-party payor claims (0.5).	1.60	680.00
Agwu, I.	1/12/22	Continue privilege review of documents for production to Liberty Mutual.	5.00	1,000.00
Agwu, I.	1/12/22	Summarize recent court decisions to update memorandum re opioid-related litigation.	2.00	400.00
Gilbert, S.	1/13/22	Confer with R. Leveridge re Rite Aid decision.	1.10	1,980.00
Shore, R.	1/13/22	Analyze Rite-Aid decision and strategy/arguments re same.	2.70	3,915.00
Hudson, J.	1/13/22	Analyze approaches to claim analysis.	.80	628.00
Girgenti, J.	1/13/22	Continue reviewing documents for privilege (4.6); continue reviewing policy provisions in at-issue policies re governmental entity coverage (3.1).	7.70	2,810.50
Rubinstein, J.	1/13/22	Review J. Girgenti summary of XL supplemental production (0.2); update litigation task list (0.5); review response to TIG (0.6); analysis re follow form language of policies (0.3); confer with team re strategy (0.8); review claims analysis (1.2); investigation re Navigators coverage (0.3).	3.90	3,315.00
Rush, M.	1/13/22	Revise discovery requests to insurers.	1.70	1,190.00
Rush, M.	1/13/22	Review Navigators' documents (0.6); communicate with co-counsel re same (0.2).	.80	560.00
Rush, M.	1/13/22	Revise summary judgment brief re Issue #14.	1.70	1,190.00
Gaske, A.	1/13/22	Review recent court filings.	.20	122.00
Gaske, A.	1/13/22	Revise policy comparison spreadsheets to apply comments throughout re policy comparison project.	1.30	793.00
Gaske, A.	1/13/22	Research annualization of limits re legal issues memorandum.	.30	183.00
Leveridge, R.	1/13/22	Communications with Debtors' counsel re response to TIG.	.60	870.00
Leveridge, R.	1/13/22	Confer with S. Gilbert re Rite Aid decision.	1.10	1,595.00
Leveridge, R.	1/13/22	Continue analyzing use of claims data in adversary proceeding.	1.10	1,595.00
Leveridge, R.	1/13/22	Review draft requests for admissions.	.40	580.00
Leveridge, R.	1/13/22	Communicate with co-counsel re draft letter from insurer counsel to Court.	.30	435.00
Leveridge, R.	1/13/22	Review defensive discovery material and strategy.	.40	580.00
Leveridge, R.	1/13/22	Review analysis of coverage language relevant to brief.	.30	435.00
Leveridge, R.	1/13/22	Review material re evidence of notice and other related issues.	.40	580.00

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Name	Date	Services	Hours	Amount
Fastenau, L.	1/13/22	Review and organize XLIA policies with discrepancies for attorney review.	1.20	390.00
Fastenau, L.	1/13/22	Review recently received productions from insurers.	.30	97.50
Fastenau, L.	1/13/22	Review most recent PPLC claim reports for attorney review.	.10	32.50
Fastenau, L.	1/13/22	Review Liberty insurer policies to ensure none are missing.	.50	162.50
Carey, C.	1/13/22	Review insurer production materials re privilege and confidentiality.	5.30	2,517.50
Sraders, S.	1/13/22	Review public documents re Issue #19.	.70	427.00
Sraders, S.	1/13/22	Revise draft letter to NAE/Aspen.	.30	183.00
Sraders, S.	1/13/22	Research re Issue #59.	.80	488.00
Sraders, S.	1/13/22	Confer with B. Hubbard re Issue #44.	.60	366.00
Kaminsky, E.	1/13/22	Revise requests for admission.	.50	280.00
Kaminsky, E.	1/13/22	Review documents for privilege documents in preparation for production to insurers.	6.20	3,472.00
Hubbard, B.	1/13/22	Review overview of third-party payor claims and document questions re various claim types.	1.40	595.00
Hubbard, B.	1/13/22	Confer with S. Sraders re batched claims for Bermuda form (0.6); confer with team re strategy (0.8); review prior claim notice and billing to insurers (0.8).	2.20	935.00
Agwu, I.	1/13/22	Continue privilege review of documents for production to Liberty Mutual.	5.50	1,100.00
Agwu, I.	1/13/22	Research specific insurer's knowledge re opioid epidemic prior to litigation for letters to insurers re discovery disputes.	2.00	400.00
Shore, R.	1/14/22	Continue analyzing Rite-Aid decision (1.0); draft note re same (1.5); review brief on Issue #27 (0.6); review brief on issue #14 (0.4).	3.50	5,075.00
Hudson, J.	1/14/22	Analyze potential additional arguments for motion for summary judgment.	.20	157.00
Hansen, K.	1/14/22	Confer with E. Kaminsky, J. Girgenti and T. Jones re review of documents for privilege.	.50	180.00
Girgenti, J.	1/14/22	Confer with E. Kaminsky, K. Hansen, and T. Jones re privilege review project.	.50	182.50
Girgenti, J.	1/14/22	Review documents for privilege that are responsive to defendants' request for production of documents (5.7); continue review of policy provisions in at-issue policies re governmental entity coverage (2.0).	7.70	2,810.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/14/22	Review January 13 letter from Navigators counsel to Debtors' counsel re technical issues re certain of Debtors' production (0.3); review A. Gaske questions re Issue #27 motion (0.3); revise requests for admission to insurers (0.7); analysis re response message to TIG (1.5); correspond with M. Rush re Issue #14 (0.2); review cover letter re Debtors' 14th production (0.1).	3.10	2,635.00
Jones, T.	1/14/22	Confer with E. Kaminsky, K. Hansen, and J. Girgenti re privilege review of documents.	.50	157.50
Jones, T.	1/14/22	Begin review of documents for privilege.	5.60	1,764.00
Rush, M.	1/14/22	Draft summary of case law re Issue #14 for clients.	.90	630.00
Rush, M.	1/14/22	Review claims submissions.	1.00	700.00
Rush, M.	1/14/22	Revise summary judgment brief re Issue #14.	.60	420.00
Gaske, A.	1/14/22	Review J. Rubinstein response to questions re potential motion on Issue #27.	.20	122.00
Leveridge, R.	1/14/22	Analyze coverage issues and related motions (1.3); revise communications to client re same (0.6).	1.90	2,755.00
Leveridge, R.	1/14/22	Communications with co-counsel re TIG (0.5); revise response to TIG (1.2).	1.70	2,465.00
Leveridge, R.	1/14/22	Review discovery issues (0.9); communications with insurance counsel re same (0.3).	1.20	1,740.00
Carey, C.	1/14/22	Review materials re privilege and confidentiality for production to insurers.	5.30	2,517.50
Carey, C.	1/14/22	Confer with E. Kaminsky, K. Hansen, and I. Agwu re insurer production review.	.50	237.50
Sraders, S.	1/14/22	Research re Issue #59.	.70	427.00
Kaminsky, E.	1/14/22	Confer with J. Girgenti, T. Jones, K. Hansen re reviewing potential production documents for privilege.	.50	280.00
Kaminsky, E.	1/14/22	Continue review of documents for privilege in preparation for production to insurers.	6.20	3,472.00
Kaminsky, E.	1/14/22	Revise request for admissions on notice.	.50	280.00
Hubbard, B.	1/14/22	Continue to review and consolidate notes re claim review and allocation next steps.	1.00	425.00
Agwu, I.	1/14/22	Continue privilege review of documents for production to Liberty Mutual.	9.00	1,800.00
Jones, T.	1/15/22	Review documents for privilege in preparation for production.	2.00	630.00
Kaminsky, E.	1/15/22	Review documents for privilege in preparation for production.	2.00	1,120.00

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Name	Date	Services	Hours	Amount
Shore, R.	1/16/22	Continue analyzing Rite-Aid decision (1.1); revise summary re same (1.4); review current draft of brief on Issue #27 (0.5); review current draft of brief on Issue #14 (0.5).	3.50	5,075.00
Hudson, J.	1/16/22	Revise summary of impact of recent ruling on coverage strategy.	.70	549.50
Jones, T.	1/16/22	Continue review of documents for privilege in preparation for production to defendants.	2.00	630.00
Rush, M.	1/16/22	Revise correspondence to clients re Issue #14.	.70	490.00
Kaminsky, E.	1/16/22	Continue revising request for admissions on notice.	.60	336.00
Kaminsky, E.	1/16/22	Review documents for privilege in response to insurers request for production.	1.80	1,008.00
Rush, M.	1/17/22	Review research re Issue #14.	.50	350.00
Kaminsky, E.	1/17/22	Continue reviewing documents for privilege in preparation for production to insurers.	2.60	1,456.00
Agwu, I.	1/17/22	Continue privilege review of documents for production to Liberty Mutual.	6.00	1,200.00
Shore, R.	1/18/22	Analyze implications of potential motion filing dates (0.2), confer with team re process for finalizing briefs and schedule for filing (1.0); review and provide comments on brief re Issue #27 (1.5); revise email to client re status, schedule, and approval process for motions (0.4).	3.10	4,495.00
Shore, R.	1/18/22	Review research re Issue #14 (0.9); confer with team re claim issues (1.1).	2.00	2,900.00
Hudson, J.	1/18/22	Review draft coverage chart.	.20	157.00
Hudson, J.	1/18/22	Analyze approach to potential motions for summary judgment and privilege logging.	1.00	785.00
Hudson, J.	1/18/22	Confer with UCC (Akin Gump) re prior claims sampling.	.10	78.50
Hudson, J.	1/18/22	Confer with UCC re approach to privilege logs.	.20	157.00
Hudson, J.	1/18/22	Review quality control re document review and privilege logs.	.20	157.00
Hudson, J.	1/18/22	Summarize process applied in prior claims sampling.	.20	157.00
Hudson, J.	1/18/22	Review analysis of case law re Issue #14.	.10	78.50
Hansen, K.	1/18/22	Review documents responsive to insurer request for production for privilege.	8.20	2,952.00
Girgenti, J.	1/18/22	Continue reviewing documents responsive to defendants' request for production of documents for privilege.	7.90	2,883.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/18/22	Confer with Debtors' counsel re strategy (0.5); review status of Navigators supplemental production review (0.7) confer with team re claims analysis team (1.1); review claims review process (0.9); confer with team re motions re Issues #14, #20, and #27 (1.0); review status of on-going projects (0.7); revise draft letter to Court re motions (0.4).	5.30	4,505.00
Jones, T.	1/18/22	Continue review of documents for privilege.	7.80	2,457.00
Rush, M.	1/18/22	Confer with team re claims issues.	1.10	770.00
Rush, M.	1/18/22	Revise summary judgment brief re Issue #14.	3.40	2,380.00
Rush, M.	1/18/22	Confer with team re summary judgment briefs.	1.00	700.00
Rush, M.	1/18/22	Continue reviewing research re Issue #14.	1.70	1,190.00
Johnson, K.	1/18/22	Revise adversary proceeding policy chart revise (0.7); draft new policy chart by insurer group (1.2).	1.90	456.00
Bonesteel, A.	1/18/22	Update production log.	3.80	1,425.00
Gaske, A.	1/18/22	Communicate with A. Bonesteel re recent document production.	.20	122.00
Gaske, A.	1/18/22	Analyze underlying complaints for certain factual allegations re potential motion on Issue #27.	1.10	671.00
Gaske, A.	1/18/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, and M. Rush re next steps in process for filing potential motions for partial summary judgment.	1.00	610.00
Gaske, A.	1/18/22	Revise potential motion on Issue #27 re factual background section.	3.10	1,891.00
Leveridge, R.	1/18/22	Revise status of various litigation issues (0.8); review material re claims information (1.0); confer with team re same (1.1); communicate with team re motions issues (1.0); communicate with co-counsel re status of projects (0.7).	4.60	6,670.00
Carey, C.	1/18/22	Continue review of insurer production materials for privilege.	4.10	1,947.50
Sraders, S.	1/18/22	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, and B. Hubbard re Issue #56.	1.10	671.00
Sraders, S.	1/18/22	Review I. Agwu research re insurer letters.	.20	122.00
Sraders, S.	1/18/22	Draft memorandum re Issue #59.	1.70	1,037.00
Kaminsky, E.	1/18/22	Continue reviewing documents re privilege for production to insurers.	3.70	2,072.00
Hubbard, B.	1/18/22	Confer with R. Leveridge, R. Shore, S. Sraders, M. Rush, and J. Rubinstein re proof of claim form claim review.	1.10	467.50
Hubbard, B.	1/18/22	Review correspondence re combined coverage type chart.	.20	85.00

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Name	Date	Services	Hours	Amount
Hubbard, B.	1/18/22	Review UCC prior analysis of PI claims (0.8); review samples of proof of claim forms to further support brief re Issue #27 (1.1)	1.90	807.50
Agwu, I.	1/18/22	Continue privilege review of documents for production to Liberty Mutual.	9.00	1,800.00
Agwu, I.	1/18/22	Continue researching specific insurer's knowledge re opioid epidemic prior to litigation for letters to insurers re discovery disputes.	2.50	500.00
Gilbert, S.	1/19/22	Confer with R. Shore re Issue #14 and strategy.	1.00	1,800.00
Shore, R.	1/19/22	Confer with UCC re motions for summary judgment (1.1); confer with team re same (0.2); review Issue #14 motion (1.5); with S. Gilbert re Issue #14 and broader strategy (1.0).	3.80	5,510.00
Hudson, J.	1/19/22	Confer with UCC (Akin Gump) re potential motions for summary judgment. (partial)	.70	549.50
Hudson, J.	1/19/22	Continue analyzing approach to potential motions for summary judgment and privilege logging.	.10	78.50
Hudson, J.	1/19/22	Analyze approach to potential motions for summary judgment.	.40	314.00
Hudson, J.	1/19/22	Analyze potential approaches to claim allocation.	.30	235.50
Hansen, K.	1/19/22	Continue reviewing documents for privilege re production to insurers.	7.90	2,844.00
Girgenti, J.	1/19/22	Continue reviewing documents responsive to defendants' request for production of documents.	7.80	2,847.00
Rubinstein, J.	1/19/22	Confer with UCC counsel re potential motions (1.1); confer with team re same (0.2); revise correspondence to multiple insurers re discovery deficiencies (0.4); provide edits to motions re Issues #27 and #14 (0.9); review privilege log associated with AHC document production (0.4); revise defensive discovery correspondence (0.4); communicate with Debtors' counsel re same (0.1).	3.50	2,975.00
Jones, T.	1/19/22	Continue review of documents for privilege re insurer request for production.	6.90	2,173.50
Rush, M.	1/19/22	Revise summary judgment brief re Issue #14.	4.40	3,080.00
Rush, M.	1/19/22	Confer with team re briefing schedule.	.20	140.00
Rush, M.	1/19/22	Confer with co-counsel re potential summary judgment briefing.	1.10	770.00
Martinez, S.	1/19/22	Research associated motions in support of Rite Aid Corp. v. ACE American Company summary judgment briefing.	.70	227.50
Johnson, K.	1/19/22	Correspond with B. Hubbard re PI claims review.	.20	48.00
Johnson, K.	1/19/22	Draft new policy chart by insurer group.	2.60	624.00

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Name	Date	Services	Hours	Amount
Gaske, A.	1/19/22	Review underlying proofs of claim to include in potential motion on Issue #27.	1.50	915.00
Gaske, A.	1/19/22	Revise potential motion on Issue #27 re factual background section.	2.50	1,525.00
Gaske, A.	1/19/22	Revise potential motion on Issue #27 to include only parties subject to motion.	.60	366.00
Gaske, A.	1/19/22	Analyze related case law re Issue #27 in other jurisdictions.	.70	427.00
Leveridge, R.	1/19/22	Analyze strategic litigation issues (0.8); confer with UCC counsel re same (1.1); confer with team re same (0.2); review and revise material re same (1.8).	3.90	5,655.00
Leveridge, R.	1/19/22	Review communications with co-counsel re offensive and defensive discovery issues.	.40	580.00
Ogrey, S.	1/19/22	Research order re summary judgment in Rite Aide v. ACE coverage action case in DE Superior Court.	.50	120.00
Carey, C.	1/19/22	Review insurer production materials re privilege and confidentiality.	3.10	1,472.50
Carey, C.	1/19/22	Analyze background research and chart re Issue #32.	.90	427.50
Carey, C.	1/19/22	Revise chart re Issue #32 background research.	.70	332.50
Sraders, S.	1/19/22	Revise draft letters to insurers re follow-up from meet-and-confer.	2.80	1,708.00
Kaminsky, E.	1/19/22	Continue review of documents for privilege in preparation for production to insurers.	4.30	2,408.00
Kaminsky, E.	1/19/22	Draft memorandum re procedural rules re request for production.	.80	448.00
Kaminsky, E.	1/19/22	Revise request for admissions.	.40	224.00
Hubbard, B.	1/19/22	Review governmental claims re proposed review process (0.4); review additional claim file to support brief (0.3); review subset of governmental claims to document initial findings (2.5); draft plan to review personal injury related claim files (2.6).	5.80	2,465.00
Agwu, I.	1/19/22	Continue review of documents for production to Liberty Mutual.	8.00	1,600.00
Agwu, I.	1/19/22	Continue summarizing recent Court decisions to update memorandum re opioid-related litigation.	3.50	700.00
Gilbert, S.	1/20/22	Confer with insurance team re litigation status and strategy.	1.00	1,800.00
Shore, R.	1/20/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, S. Sraders, and B. Hubbard re claims analysis.	1.30	1,885.00
Shore, R.	1/20/22	Confer with team re litigation issues.	1.00	1,450.00
Hudson, J.	1/20/22	Confer with team re litigation status and strategy.	1.00	785.00

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Hudson, J.	1/20/22	Review National Union's answer to complaint.	.10	78.50
Hudson, J.	1/20/22	Confer with UCC (Akin Gump) re document production.	.10	78.50
Hudson, J.	1/20/22	Confer with E. Kaminsky re privilege log and document production.	.60	471.00
Hudson, J.	1/20/22	Confer with UCC team (Akin Gump) re privilege logs.	.30	235.50
Hudson, J.	1/20/22	Analyze approach to privilege log.	1.20	942.00
Hudson, J.	1/20/22	Confer with UCC (Akin Gump) re claims analysis.	.10	78.50
Hudson, J.	1/20/22	Analyze potential approaches to claim review.	1.30	1,020.50
Hansen, K.	1/20/22	Continue reviewing documents re privilege for production to insurers.	6.60	2,376.00
Girgenti, J.	1/20/22	Confer with team re litigation update.	1.00	365.00
Girgenti, J.	1/20/22	Continue reviewing document for privilege that are responsive to defendants' request for production of documents.	4.60	1,679.00
Rubinstein, J.	1/20/22	Revise litigation task list (0.6); confer with team re litigation strategy (1.0); correspond with Debtors' counsel re response to Navigators letter re production (0.2); analysis re review claim analysis (0.5); analyze discovery issues and other strategic decisions (0.6); review proposed response to National Union discovery correspondence (0.5); review revisions to offensive discovery correspondence (0.2); analysis re document review/production in response to requests to AHC (0.3); revise supplemental requests for admission (0.3); revise current version of motion re Issue #14 (0.2); confer with claim analysis team re status (1.3).	5.70	4,845.00
Wolf, D.	1/20/22	Revise summary judgment motion re Issue #27.	.30	232.50
Jones, T.	1/20/22	Review documents for privilege for potential production to insurers.	8.40	2,646.00
Rush, M.	1/20/22	Review letter from National Union re discovery.	1.40	980.00
Rush, M.	1/20/22	Review claims notes.	.60	420.00
Rush, M.	1/20/22	Review draft requests for admissions.	.50	350.00
Rush, M.	1/20/22	Confer with team re litigation status and strategy.	1.00	700.00
Rush, M.	1/20/22	Revise deficiency letters to insurers.	.50	350.00
Rush, M.	1/20/22	Confer with team re claims issues.	1.30	910.00

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Name	Date	Services	Hours	Amount
Martinez, S.	1/20/22	Confer with S. Gilbert R. Shore, J. Hudson, R. Leveridge, M. Rush, I. Agwu, A. Bonesteel, A. Gaske, J. Rubinstein, C. Carey, B. Hubbard, S. Sraders, K. Johnson, A. Farra, L. Fastenau, J. Girgenti, and E. Kaminsky re case status and ongoing developments.	1.00	325.00
Martinez, S.	1/20/22	Review and organize materials re Travelers Prop. Cas. Co. of Am. v. Anda, Inc.	.30	97.50
Johnson, K.	1/20/22	Confer with team re litigation status and strategy.	1.00	240.00
Johnson, K.	1/20/22	Review and organize research on categorical privilege logs materials.	.30	72.00
Johnson, K.	1/20/22	Continue drafting new policy chart by insurer group (2.3); draft policy chart re policies not in arbitration by insurer group (4.8).	7.10	1,704.00
Bonesteel, A.	1/20/22	Confer with team re litigation update.	1.00	375.00
Gaske, A.	1/20/22	Confer with team re litigation strategy and next steps.	1.00	610.00
Gaske, A.	1/20/22	Research potential strategy in response to certain recently issued coverage decision.	1.90	1,159.00
Gaske, A.	1/20/22	Revise potential motion on Issue #27 re factual background section.	2.70	1,647.00
Gaske, A.	1/20/22	Research and distinguish certain cases on Issue #27.	3.00	1,830.00
Leveridge, R.	1/20/22	Review claims analysis strategy (1.5); confer with team re same (1.3).	2.80	4,060.00
Leveridge, R.	1/20/22	Confer with team re litigation projects.	1.00	1,450.00
Ogrey, S.	1/20/22	Review revised coverage chart of policies still in arbitration.	.30	72.00
Fastenau, L.	1/20/22	Confer with S. Gilbert, R. Shore, J. Hudson, M. Rush, I. Agwu, R. Leveridge, C. Carey, J. Girgenti, A. Farra, J. Rubinstein, S. Sraders, E. Kaminsky, B. Hubbard, K. Johnson, and A. Bonesteel re status and strategy.	1.00	325.00
Fastenau, L.	1/20/22	Review and organize proofs of claim reports for attorney review.	.10	32.50
Farra, A.	1/20/22	Confer with team re litigation status update.	1.00	710.00
Carey, C.	1/20/22	Review insurer production materials re privilege.	5.10	2,422.50
Carey, C.	1/20/22	Confer with R. Leveridge, J. Rubinstein, J. Hudson and others re case status and strategy.	1.00	475.00
Carey, C.	1/20/22	Communicate with M. Rush, S. Sraders, and I. Agwu re Issue #32 case precedent.	.20	95.00
Sraders, S.	1/20/22	Confer with team re litigation status and next steps.	1.00	610.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/20/22	Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, M. Rush, and B. Hubbard re claims analysis.	1.30	793.00
Sraders, S.	1/20/22	Review information and correspondence re Issue #56.	.80	488.00
Sraders, S.	1/20/22	Revise draft letters to send to co-counsel.	.40	244.00
Kaminsky, E.	1/20/22	Confer with J. Hudson re privilege log and production documents.	.60	336.00
Kaminsky, E.	1/20/22	Continue drafting requests for admission.	1.10	616.00
Kaminsky, E.	1/20/22	Confer with team re litigation status and strategy.	1.00	560.00
Kaminsky, E.	1/20/22	Review documents for privilege in response to request for production from insurers.	4.50	2,520.00
Hubbard, B.	1/20/22	Confer with litigation team re project status and strategy (1.0); confer with J. Hudson, S. Sraders, R. Shore, R. Leveridge, J. Rubinstein, M. Rush re PI claim review process (1.3); review claim analysis process (0.5).	2.80	1,190.00
Hubbard, B.	1/20/22	Review correspondence re plan to review personal injury related claim files.	.90	382.50
Agwu, I.	1/20/22	Meet with team re litigation status and strategy.	1.00	200.00
Agwu, I.	1/20/22	Continue privilege review of documents for production to Liberty Mutual.	6.90	1,380.00
Agwu, I.	1/20/22	Continue summarizing recent court decisions to update memorandum re opioid-related litigation.	4.60	920.00
Shore, R.	1/21/22	Confer with co-counsel re claim review and other litigation issues (0.8); review motion for partial summary judgments (1.2).	2.00	2,900.00
Shore, R.	1/21/22	Revise and provide comments on Issue #14 brief.	2.50	3,625.00
Hudson, J.	1/21/22	Confer with UCC (Akin Gump) re discovery.	.40	314.00
Hudson, J.	1/21/22	Confer with UCC (Akin Gump) re options for claims analysis.	.40	314.00
Hansen, K.	1/21/22	Continue reviewing documents for production to insurers.	7.40	2,664.00
Girgenti, J.	1/21/22	Continue reviewing documents for privilege responsive to defendants' request for production of documents (1.3); quality check documents from privilege review marked for production (5.7).	7.00	2,555.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/21/22	Review National Union answer (0.3); communicate with M. Rush re insurer responses to second set of requests for production (0.1); review correspondence with UCC counsel re claim analysis (0.2); review National Union January 19 discovery letter (0.4); review issues in preparation for calls with Debtors' counsel and UCC counsel (0.4); review Liberty supplemental interrogatory responses and responses to plaintiffs' second set of request for production (0.4); provide comments to motion re Issue #14 (0.4); review XLIA responses to plaintiffs' second set of requests for production (0.2); review Aspen and NAE responses to plaintiffs second set of requests for production (0.4); confer with UCC counsel, Debtors' counsel, and AHC counsel re discovery issues (0.4); confer with UCC and AHC counsel re claim analysis (0.4); review final letter to C. Sorensen re production issue (0.1)	3.70	3,145.00
Jones, T.	1/21/22	Review documents for privilege for production to insures.	7.80	2,457.00
Rush, M.	1/21/22	Review National Union answer.	.50	350.00
Rush, M.	1/21/22	Review insurers' discovery responses.	1.50	1,050.00
Rush, M.	1/21/22	Revise summary judgment brief re Issue #14.	1.10	770.00
Rush, M.	1/21/22	Confer with co-counsel re discovery issues.	.40	280.00
Rush, M.	1/21/22	Confer with co-counsel re claims issues.	.40	280.00
Johnson, K.	1/21/22	Finalize policy chart re policies not in arbitration by insurer group.	2.30	552.00
Gaske, A.	1/21/22	Review National Union answer to complaint.	.20	122.00
Leveridge, R.	1/21/22	Review National Union answer and affirmative defenses.	.40	580.00
Leveridge, R.	1/21/22	Review discovery responses from certain insurers.	1.20	1,740.00
Leveridge, R.	1/21/22	Confer with co-counsel re discovery responses and proposals for meet-and-confers.	.40	580.00
Leveridge, R.	1/21/22	Confer with co-counsel re claims analysis.	.40	580.00
Leveridge, R.	1/21/22	Review draft of brief re coverage issues (1.3); communications with co-counsel re same (0.3).	1.60	2,320.00
Ogrey, S.	1/21/22	Revise coverage chart of all policies in the adversary proceeding to denote those that remain in arbitration.	2.20	528.00
Farra, A.	1/21/22	Confer with Reed Smith, Cole Schotz, and Akin Gump re discovery status update.	.40	284.00
Farra, A.	1/21/22	Confer with Akin Gump and Province re claims process.	.40	284.00

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Name	Date	Services	Hours	Amount
Carey, C.	1/21/22	Review insurer production materials re privilege and confidentiality.	4.70	2,232.50
Sraders, S.	1/21/22	Confer with Province, Akin Gump and team re analysis of proofs of claim.	.40	244.00
Sraders, S.	1/21/22	Prepare chart tracking status of various letters with insurers.	.30	183.00
Sraders, S.	1/21/22	Review discovery responses provided by insurers.	.10	61.00
Kaminsky, E.	1/21/22	Review documents for privilege in response to request for production.	3.70	2,072.00
Hubbard, B.	1/21/22	Communicate with UCC consultant re additional opioid manufacturer information to assist them in claim file review exercise.	.70	297.50
Hubbard, B.	1/21/22	Correspond with R. Leveridge re prior opioid manufacturer research.	.20	85.00
Agwu, I.	1/21/22	Finish privilege review of documents for production to Liberty Mutual.	8.00	1,600.00
Shore, R.	1/24/22	Confer with J. Rubinstein, R. Leveridge, and A. Farra re discovery Issue #14.	.30	435.00
Shore, R.	1/24/22	Review and revise Issue #14 brief.	4.00	5,800.00
Shore, R.	1/24/22	Review and provide comments on Issue #27 brief.	6.50	9,425.00
Hudson, J.	1/24/22	Review list of opioids by manufacturer.	.10	78.50
Hudson, J.	1/24/22	Confer with UCC (Akin Gump) re responding to insurers' document requests to Committees.	.50	392.50
Hudson, J.	1/24/22	Analyze options for responding to insurers' document requests to Committees.	.40	314.00
Hudson, J.	1/24/22	Review updated reference coverage charts.	.10	78.50
Girgenti, J.	1/24/22	Quality check and re-code documents from privilege review.	7.50	2,737.50
Rubinstein, J.	1/24/22	Fact investigation re Issue #27 (0.9); confer with R. Shore, R. Leveridge, and A. Farra re Issue #14 (0.3); review legal research re Issue #14 (1.0); analysis re offensive discovery strategy (0.7); review Gulf objections and responses to second set of requests for production (0.3); confer with co-plaintiff counsel re privilege log issue (0.7); review Navigators letter of January 21 re discovery (0.2); review Navigators 2nd set of requests for production (0.2); review correspondence accompanying Debtors' fifteenth production (0.1); review case law for motion re Issue #27 (1.0); correspond with S. Sraders re finalizing discovery letters to multiple insurers re insurer deficiencies (0.2).	5.60	4,760.00
Rush, M.	1/24/22	Review insurer discovery responses.	.80	560.00

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Rush, M.	1/24/22	Draft discovery requests to insurers.	1.30	910.00
Rush, M.	1/24/22	Revise summary judgment motion re Issue #14.	2.40	1,680.00
Johnson, K.	1/24/22	Review and organize recently received discovery pleadings.	.50	120.00
Johnson, K.	1/24/22	Revise policy chart re policies not in arbitration by insurer group.	.50	120.00
Bonesteel, A.	1/24/22	Confer with document vendor re outgoing production.	.50	187.50
Bonesteel, A.	1/24/22	Review and update insurer production.	1.00	375.00
Bonesteel, A.	1/24/22	Communicate with document vendor re status of loading incoming productions from insurers.	.50	187.50
Leveridge, R.	1/24/22	Confer with team re discovery, motions practice and factual development (0.3); review material re same (1.6).	1.90	2,755.00
Leveridge, R.	1/24/22	Communicate with co-counsel re status of discovery, motions practice, factual development.	1.40	2,030.00
Farra, A.	1/24/22	Confer with R. Shore, R. Leveridge, and J. Rubinstein re discovery issues.	.30	213.00
Sraders, S.	1/24/22	Finalize draft letters to insurers re follow-up from meet-and-confers.	.90	549.00
Sraders, S.	1/24/22	Draft response letter to National Union.	3.00	1,830.00
Kaminsky, E.	1/24/22	Review documents for privilege in response to request for production.	3.10	1,736.00
Hubbard, B.	1/24/22	Prepare random sample of personal injury claims from proof of claim data (2.5); cross-reference random sample with amended claims to create most up-to-date data set (1.5); organize data (2.5); cleanse data and prepare initial review template fields (3.5).	10.00	4,250.00
Agwu, I.	1/24/22	Research re scope of producing party's obligation to search for responsive documents.	6.00	1,200.00
Shore, R.	1/25/22	Continue reviewing and revising current draft of Issue #27 motion for partial summary judgment (2.4); confer with team re same (0.6); confer with team re discovery issues (1.1); review and comment on discovery requests (0.8); revise draft email to AHC re hearing (0.4); review cases re Issue #27 (0.6); analyze adversary proceeding strategy and next steps (0.6).	6.50	9,425.00
Hudson, J.	1/25/22	Confer with team re options following SDNY ruling.	.60	471.00
Hudson, J.	1/25/22	Analyze next steps for potential motions for summary judgment.	.10	78.50
Hudson, J.	1/25/22	Analyze approach to privilege logs.	.30	235.50

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Name	Date	Services	Hours	Amount
Hudson, J.	1/25/22	Confer with UCC (Akin Gump) re approach to privilege logs.	.20	157.00
Girgenti, J.	1/25/22	Continue quality checking and re-coding documents from privilege review (4.7); review Navigators document production for relevance and responsive documents (2.9).	7.60	2,774.00
Rubinstein, J.	1/25/22	Revise discovery letters to NAE, Aspen, XLIA, and Zurich (1.6); confer with M. Rush, R. Leveridge, S. Sraders, and R. Shore re affirmative discovery tasks (1.0); revise first sets of requests for production and interrogatories exclusively issued to Navigators (0.5); confer with R. Leveridge re AHC privilege log (0.4); confer with team re Issue #14 (0.6); review discovery correspondence from Liberty and outline response (0.4); review R. Shore comments to motion re Issue #14 (0.7); revise motion re Issue #27 (1.0).	6.20	5,270.00
Rush, M.	1/25/22	Communicate with team re claims issues.	.20	140.00
Rush, M.	1/25/22	Confer with team re discovery issues.	1.10	770.00
Rush, M.	1/25/22	Draft discovery requests to Navigators.	1.90	1,330.00
Rush, M.	1/25/22	Review letter from Liberty re discovery responses.	.40	280.00
Rush, M.	1/25/22	Confer with team re summary judgment briefs and case status.	.60	420.00
Rush, M.	1/25/22	Draft summary of recent case law.	.20	140.00
Martinez, S.	1/25/22	Confer with B. Hubbard, A. Gaske, K. Johnson, S. Ogrey, S. Colcock and L. Fastenau re proofs of claim forms research.	1.60	520.00
Johnson, K.	1/25/22	Confer with B. Hubbard, A. Gaske, S. Colcock, L. Fastenau, S. Ogrey, and S. Martinez re proofs of claim forms.	1.60	384.00
Bonesteel, A.	1/25/22	Communicate with document vendor re status of loading incoming productions from insurers.	1.00	375.00
Gaske, A.	1/25/22	Review comments from R. Shore to potential motion on Issue #27.	.50	305.00
Gaske, A.	1/25/22	Review and respond to J. Rubinstein comments on additions to potential motion on Issue #27.	.50	305.00
Gaske, A.	1/25/22	Confer with B. Hubbard, L. Fastenau, S. Colcock, S. Martinez, K. Johnson, and S. Ogrey re proofs of claim.	1.60	976.00
Gaske, A.	1/25/22	Revise potential motion on Issue #27 pursuant to comments from R. Shore.	1.00	610.00
Leveridge, R.	1/25/22	Review strategic issues and discussions with co-counsel.	1.60	2,320.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	1/25/22	Review oral argument tape re relevant case law (0.4); communicate with co-counsel re same (0.4).	.80	1,160.00
Leveridge, R.	1/25/22	Confer with J. Rubinstein re AHC document production and privilege logs.	.60	870.00
Leveridge, R.	1/25/22	Confer with team re offensive discovery.	1.10	1,595.00
Leveridge, R.	1/25/22	Review material re claims against Sacklers.	1.40	2,030.00
Ogry, S.	1/25/22	Confer with B. Hubbard, A. Gaske, K. Johnson, S. Ogry, and S. Martinez, and S. Colcock re proofs of claim forms.	1.60	384.00
Fastenau, L.	1/25/22	Confer with B. Hubbard, A. Gaske, K. Johnson, S. Ogry, S. Colcock, and S. Martinez re proofs of claim forms research.	1.60	520.00
Fastenau, L.	1/25/22	Revise opioids by manufacturer spreadsheet to include additional information provided by J. Hudson.	2.50	812.50
Sraders, S.	1/25/22	Confer with M. Rush, R. Leveridge, J. Rubinstein, and R. Shore re discovery strategy.	1.10	671.00
Sraders, S.	1/25/22	Finalize and send letters to insurers re follow-up from meet-and-confers.	1.20	732.00
Sraders, S.	1/25/22	Draft response to letter from National Union.	1.30	793.00
Sraders, S.	1/25/22	Communicate with A. Bonesteel and J. Girgenti re Navigators production.	.10	61.00
Sraders, S.	1/25/22	Review first and draft second set of interrogatories.	.20	122.00
Colcock, S.	1/25/22	Confer with B. Hubbard, A. Gaske, K. Johnson, S. Ogry, L. Fastenau and S. Martinez re proofs of claim forms research.	1.60	560.00
Kaminsky, E.	1/25/22	Review documents for privilege in response to request for production.	2.00	1,120.00
Hubbard, B.	1/25/22	Confer with I. Agwu re personal injury proof of claim file review (2.0); confer with team re personal injury proof of claim file review (1.6); review status of opioid research (0.2).	3.80	1,615.00
Agwu, I.	1/25/22	Confer with B. Hubbard re proofs of claim review.	2.00	400.00
Shore, R.	1/26/22	Confer with J. Rubinstein, R. Leveridge, M. Rush, and A. Gaske re motions re Issues #14 and #27.	2.20	3,190.00
Shore, R.	1/26/22	Analyze key provisions of case relevant to Issue #27 (1.1); review memorandum on ripeness/justiciability (0.2).	1.30	1,885.00
Hudson, J.	1/26/22	Outline approach to privilege log.	.10	78.50
Hudson, J.	1/26/22	Confer with UCC (Akin Gump) re litigation strategy.	.60	471.00
Hudson, J.	1/26/22	Analyze potential summary judgment motion strategy.	.30	235.50

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Name	Date	Services	Hours	Amount
Hudson, J.	1/26/22	Review revised coverage charts.	.10	78.50
Girgenti, J.	1/26/22	Continue quality checking documents from targeted privilege review searches (3.7); continue reviewing analyze Navigators document production for relevance and responsive documents (3.0).	6.70	2,445.50
Rubinstein, J.	1/26/22	Confer with R. Shore, R. Leveridge, M. Rush, and A. Gaske re motions re Issues #14 and #27 (2.2); revise same (1.3); revise letter to Court re Issues #14 and #27 motions (0.3); confer with UCC counsel re motions (0.9); fact investigation re claims (1.2); review privilege log (0.1); revise draft response to January 21 Liberty letter (0.5).	6.50	5,525.00
Rush, M.	1/26/22	Confer with team re summary judgment briefs.	2.20	1,540.00
Rush, M.	1/26/22	Review discovery issues.	.80	560.00
Rush, M.	1/26/22	Confer with co-counsel re summary judgment briefs.	.90	630.00
Johnson, K.	1/26/22	Review policy chart re policies not in arbitration labeling.	.30	72.00
Bonesteel, A.	1/26/22	Review compensation-related documents and batch set for review.	.70	262.50
Gaske, A.	1/26/22	Confer with R. Shore, R. Leveridge, M. Rush, and J. Rubinstein re comments on potential motion on Issue #27.	2.20	1,342.00
Gaske, A.	1/26/22	Confer with UCC re potential motion on Issue #14.	.90	549.00
Gaske, A.	1/26/22	Revise potential motion on Issue #27 pursuant to team comments.	1.30	793.00
Gaske, A.	1/26/22	Review R. Shore comments on certain case re potential motion on Issue #27.	.10	61.00
Leveridge, R.	1/26/22	Confer with team re brief and legal research.	2.20	3,190.00
Leveridge, R.	1/26/22	Review legal research re exclusionary language.	.90	1,305.00
Leveridge, R.	1/26/22	Confer with counsel for UCC re strategic issues (0.9); draft follow-up communications re same (0.7).	1.60	2,320.00
Leveridge, R.	1/26/22	Review status of document review and privilege logs.	.40	580.00
Leveridge, R.	1/26/22	Analyze Sackler claim issue.	1.20	1,740.00
Fastenau, L.	1/26/22	Revise opioids by manufacturer spreadsheet to include additional information provided by J. Hudson.	1.00	325.00
Fastenau, L.	1/26/22	Draft comprehensive list of generic opioids.	1.00	325.00
Fastenau, L.	1/26/22	Confer with B. Hubbard re comprehensive list of generic opioids.	.40	130.00
Sraders, S.	1/26/22	Draft email response to Liberty	1.40	854.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/26/22	Review and revise chart re Issue #58.	1.20	732.00
Sraders, S.	1/26/22	Revise draft letter to National Union to incorporate comments from M. Rush.	.20	122.00
Kaminsky, E.	1/26/22	Review documents for privilege in response to request for production.	4.20	2,352.00
Kaminsky, E.	1/26/22	Revise draft of research memorandum re Issue #25.	.40	224.00
Hubbard, B.	1/26/22	Draft guidelines for review of proofs of claim (3.2); initial review of claims to prepare for training (4.9).	8.10	3,442.50
Hubbard, B.	1/26/22	Correspond with team re opioid review (0.8); confer with L. Fastenau re opioid research and data updates (0.4).	1.20	510.00
Agwu, I.	1/26/22	Continue research re scope of producing party's obligation to search for responsive documents.	2.00	400.00
Gilbert, S.	1/27/22	Confer with R. Leveridge, R. Shore, J. Rubinstein, and M. Rush re insurance litigation strategy.	.90	1,620.00
Shore, R.	1/27/22	Analyze case law cited in brief re Issue #27 (2.5); confer with insurers re discovery issues (0.5); confer with S. Gilbert, R. Leveridge, J. Rubinstein, and M. Rush re insurance strategy (0.9); confer with team re litigation status and next steps (0.6); confer with R. Leveridge, J. Rubinstein and M. Rush re motion for partial summary judgment strategy (0.5).	5.00	7,250.00
Hudson, J.	1/27/22	Confer with team re litigation status.	.60	471.00
Hudson, J.	1/27/22	Analyze scope of batch notice.	.10	78.50
Hudson, J.	1/27/22	Review status of document review and production preparations.	.40	314.00
Hudson, J.	1/27/22	Confer with document vendor re upcoming production.	.30	235.50
Girgenti, J.	1/27/22	Confer with team re litigation update.	.60	219.00
Girgenti, J.	1/27/22	Continue quality check re documents from targeted privilege review searches (2.5); continue review of Navigators document production for relevance and responsive documents (2.7).	5.20	1,898.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/27/22	Review issues in preparation for meet-and-confer with National Union meet (0.3); meet-and-confer with National Union re discovery issues (1.0); revise discovery response to Liberty (0.3); confer with S. Gilbert, R. Leveridge, R. Shore and M. Rush re litigation strategy (0.9); update litigation task list (0.4); confer with team re litigation status and strategy (0.6); confer with R. Shore, R. Leveridge, and M. Rush re edits to brief re Issue #14 (1.2); analysis re claim review project (0.4) review proposed edits to Issue #27 brief (0.2); revise claim analysis review protocol (1.2).	6.50	5,525.00
Rush, M.	1/27/22	Revise discovery e-mails to insurers.	1.80	1,260.00
Rush, M.	1/27/22	Meet-and-confer with National Union re discovery issues.	1.00	700.00
Rush, M.	1/27/22	Confer with team re summary judgment briefs.	1.20	840.00
Rush, M.	1/27/22	Revise summary judgment brief re Issue #14.	1.30	910.00
Rush, M.	1/27/22	Confer with team re status and strategy.	.60	420.00
Rush, M.	1/27/22	Confer with S. Gilbert, R. Shore, R. Leveridge and J. Rubinstein re strategy.	.90	630.00
Martinez, S.	1/27/22	Confer with R. Shore, M. Rush, I. Agwu, A. Bonesteel, J. Hudson, A. Gaske, J. Rubinstein, B. Hubbard, S. Sradars, A. Farra, L. Fastenau, S. Ogrey, S. Colcock, J. Girgenti, E. Kaminsky re case status and ongoing developments.	.60	195.00
Bonesteel, A.	1/27/22	Confer with team re litigation strategy / status.	.60	225.00
Bonesteel, A.	1/27/22	Confer with document vendor re outgoing production.	.50	187.50
Bonesteel, A.	1/27/22	Continue reviewing compensation-related documents and batch set for review.	1.40	525.00
Gaske, A.	1/27/22	Revise adversary proceeding tracking spreadsheet to include answer from National Union.	1.40	854.00
Gaske, A.	1/27/22	Confer with litigation team re strategy and next steps.	.60	366.00
Gaske, A.	1/27/22	Revise portion of potential motion on Issue #27 re distinguishing cases.	2.10	1,281.00
Leveridge, R.	1/27/22	Confer with S. Gilbert, R. Shore, J. Rubinstein and M. Rush re strategy.	.90	1,305.00
Leveridge, R.	1/27/22	Confer with team re adversary proceeding status.	.60	870.00
Leveridge, R.	1/27/22	Analyze issues in preparation for meet-and-confer with insurers (0.6); meet-and-confer with opposing counsel and co-counsel (1.0).	1.60	2,320.00
Leveridge, R.	1/27/22	Communicate with Debtors' counsel re discovery issues.	.40	580.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	1/27/22	Confer with R. Shore, J. Rubinstein and M. Rush re briefs.	1.20	1,740.00
Leveridge, R.	1/27/22	Review policy language re exclusions.	.70	1,015.00
Ogrey, S.	1/27/22	Confer with M. Rush, I. Agwu, R. Leveridge, C. Carey, J. Girgenti, A. Farra, J. Rubinstein, S. Sraders, E. Kaminsky, B. Hubbard, R. Shore, J. Hudson, L. Fastenau, S. Ogrey, and A. Bonesteel re status and strategy.	.60	144.00
Fastenau, L.	1/27/22	Confer with team re status and strategy.	.60	195.00
Fastenau, L.	1/27/22	Revise comprehensive list of generic opioids by manufacturers.	1.20	390.00
Farra, A.	1/27/22	Confer with team re litigation status update.	.60	426.00
Sraders, S.	1/27/22	Confer with litigation team re recent developments and strategy for next steps.	.60	366.00
Sraders, S.	1/27/22	Revise draft response to Liberty re discovery letters.	.70	427.00
Colcock, S.	1/27/22	Confer with R. Shore, M. Rush, I. Agwu, A. Bonesteel, J. Hudson, A. Gaske, J. Rubinstein, B. Hubbard, S. Sraders, A. Farra, L. Fastenau, J. Girgenti, E. Kaminsky, S. Ogrey and S. Martinez re status and strategy.	.60	210.00
Kaminsky, E.	1/27/22	Confer with team re litigation status and strategy.	.60	336.00
Kaminsky, E.	1/27/22	Confer with document vendor re privilege review in response to request for production from insurers.	.50	280.00
Kaminsky, E.	1/27/22	Review documents for privilege in response to request for production.	4.80	2,688.00
Hubbard, B.	1/27/22	Initial review of example claims in preparation for training (3.1); confer with M. Rush, S. Martinez, I. Agwu, A. Bonesteel, J. Hudson, A. Gaske, J. Rubinstein, S. Sraders, A. Farra, L. Fastenau, J. Girgenti, E. Kaminsky and R. Leveridge re status and strategy (0.6).	3.70	1,572.50
Hubbard, B.	1/27/22	Correspond with J. Rubinstein re training and claim file review plan.	1.40	595.00
Agwu, I.	1/27/22	Confer with team re litigation update.	.60	120.00
Agwu, I.	1/27/22	Research re scope of producing party's obligation to search for responsive documents.	3.60	720.00
Agwu, I.	1/27/22	Review sample proofs of claim for training purposes.	2.00	400.00
Agwu, I.	1/27/22	Review guidelines re proofs of claim training.	1.60	320.00
Shore, R.	1/28/22	Review scheduling issues (0.3); review cases and arguments re Issue #27 brief (1.7).	2.00	2,900.00
Hudson, J.	1/28/22	Review status of document review and production.	.10	78.50

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Name	Date	Services	Hours	Amount
Hudson, J.	1/28/22	Review status of document review for initial AHC rolling production.	.30	235.50
Hudson, J.	1/28/22	Confer with Debtors (Reed Smith) re notice-related production.	.10	78.50
Hudson, J.	1/28/22	Outline process for supplemental responses to contention interrogatories.	1.20	942.00
Girgenti, J.	1/28/22	Quality check documents from targeted privilege review searches (2.1); continue reviewing Navigators document production for relevance and responsive documents (2.7).	4.80	1,752.00
Rubinstein, J.	1/28/22	Confer with Debtors' counsel re litigation strategy (0.8); analyze same (0.6); confer with B. Hubbard and I. Agwu re claim analysis project (1.0); confer with review team re claim analysis project (2.0).	4.40	3,740.00
Rush, M.	1/28/22	Revise summary judgment brief re Issue #14.	1.30	910.00
Rush, M.	1/28/22	Draft e-mail to insurers re discovery responses.	1.30	910.00
Martinez, S.	1/28/22	Confer with I. Agwu, S. Ogrey, S. Colcock, B. Hubbard and J. Rubinstein re proofs of claim review.	2.00	650.00
Gaske, A.	1/28/22	Review case law related to certain language making up Issue #27.	.70	427.00
Leveridge, R.	1/28/22	Confer with co-counsel for Debtors re strategy.	.80	1,160.00
Leveridge, R.	1/28/22	Review status of litigation tasks.	.70	1,015.00
Leveridge, R.	1/28/22	Review and revise draft correspondence with opposing counsel re offensive discovery (0.4); review communications from Navigators re board materials (0.3).	.70	1,015.00
Leveridge, R.	1/28/22	Review legal research (1.6); communication with co-counsel re same (0.3).	1.90	2,755.00
Leveridge, R.	1/28/22	Review communications with UCC counsel re privilege logging.	.20	290.00
Ogrey, S.	1/28/22	Review status of expert research project.	.60	144.00
Ogrey, S.	1/28/22	Confer with B. Hubbard, J. Rubinstein, S. Colcock, S. Martinez, and I. Agwu re proof of claim review process.	2.00	480.00
Farra, A.	1/28/22	Analyze contention interrogatory responses.	1.00	710.00
Colcock, S.	1/28/22	Confer with I. Agwu, S. Ogrey, S. Martinez, B. Hubbard and J. Rubinstein re proofs of claim review.	2.00	700.00
Kaminsky, E.	1/28/22	Review documents for privilege in response to request for production.	3.00	1,680.00
Kaminsky, E.	1/28/22	Draft search terms for addition collection in response to insurers' request for production.	.80	448.00

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Name	Date	Services	Hours	Amount
Turner, C.	1/28/22	Research experts for MDL and non-MDL cases.	.30	60.00
Hubbard, B.	1/28/22	Confer with J. Rubinstein and I. Agwu in preparation for claim file review training (1.0); provide training for claim file review to S. Martinez, S. Colcock and S. Ogrey (2.0).	3.00	1,275.00
Agwu, I.	1/28/22	Confer with S. Colcock, S. Ogrey, S. Martinez, B. Hubbard and J. Rubinstein re proofs of claim review.	2.00	400.00
Agwu, I.	1/28/22	Confer with B. Hubbard and J. Rubinstein re proofs of claim review.	1.00	200.00
Agwu, I.	1/28/22	Review guidelines and sample POC PI data for upcoming review.	1.50	300.00
Agwu, I.	1/28/22	Begin reviewing first batch of claims for personal injury claim review.	2.50	500.00
Hudson, J.	1/30/22	Outline status and next steps for production-related tasks.	.90	706.50
Rubinstein, J.	1/30/22	Review discovery emails (0.6); review correspondence re case law re Issue #27 (0.4); revise correspondence to insurers re 2nd set of requests for production to insurers (0.5).	1.50	1,275.00
Kaminsky, E.	1/30/22	Review documents for privilege in response to request for production.	1.20	672.00
Shore, R.	1/31/22	Review letter to insurer re discovery responses and provide comments re same (0.4); revise portion of brief on Issue #27 (0.8); review new coverage charts (0.8).	2.00	2,900.00
Hudson, J.	1/31/22	Review first batch of AHC document production.	.50	392.50
Hudson, J.	1/31/22	Confer with Brown Rudnick re production of AHC materials.	.10	78.50
Hudson, J.	1/31/22	Review status of coverage charts.	.50	392.50
Hudson, J.	1/31/22	Confer with Debtors (Reed Smith), A. Farra, and E. Kaminsky re responding to insurer requests for notice-related production.	.20	157.00
Hudson, J.	1/31/22	Confer with E. Kaminsky re finalizing initial AHC document production.	.40	314.00
Hudson, J.	1/31/22	Revise update to insurers re status of document production.	.10	78.50
Hudson, J.	1/31/22	Review common interest research.	.30	235.50
Hudson, J.	1/31/22	Review scope of second round of document collection.	.10	78.50
Girgenti, J.	1/31/22	Review and redact documents for production from privilege review.	2.80	1,022.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/31/22	Revise various discovery letters (2.6); correspond with National Union and Navigators re same (0.3); revise correspondence to insurers re AHC production update (0.1); review proposed edits of R. Shore to discovery correspondence (0.2); review revised coverage charts (0.2); begin outlining affirmative deposition strategy (0.9)	4.30	3,655.00
Wolf, D.	1/31/22	Research common interest doctrine re discovery matters.	.40	310.00
Rush, M.	1/31/22	Revise letter to insurers re discovery responses.	.30	210.00
Rush, M.	1/31/22	Review Navigators' documents.	.60	420.00
Martinez, S.	1/31/22	Analyze proofs of claim sample index (claims 1-35).	1.80	585.00
Johnson, K.	1/31/22	Finalize policy charts re revision of chart titles.	3.20	768.00
Bonesteel, A.	1/31/22	Meet with document vendor re outgoing production.	.50	187.50
Gaske, A.	1/31/22	Review Insurer #5 policies for certain provisions re potential motion on Issue #27.	.90	549.00
Gaske, A.	1/31/22	Communicate with R. Shore and R. Leveridge re comments on draft potential motion on Issue #27 (0.2); continue revising draft pursuant to comments (1.5).	1.70	1,037.00
Leveridge, R.	1/31/22	Review outstanding offensive and defensive discovery issues.	.60	870.00
Leveridge, R.	1/31/22	Review and revise correspondence with insurer counsel re discovery (0.8); review status of document production (0.4).	1.20	1,740.00
Fastenau, L.	1/31/22	Organize most recent PPLC claim reports for attorney review.	.10	32.50
Farra, A.	1/31/22	Confer with L. Szymanski, J. Hudson and E. Kaminsky re discovery.	.20	142.00
Sraders, S.	1/31/22	Revise draft letter to National Union to incorporate edits from J. Rubinstein.	.40	244.00
Sraders, S.	1/31/22	Revise and finalize letter to Navigators re discovery.	3.10	1,891.00
Colcock, S.	1/31/22	Begin review of proofs of claim (3 claims).	2.10	735.00
Kaminsky, E.	1/31/22	Confer with J. Hudson re privilege review for request for production update.	.30	168.00
Kaminsky, E.	1/31/22	Analyze privilege review re production of documents.	.40	224.00
Kaminsky, E.	1/31/22	Confer with Debtors, J. Hudson and A. Farra re defensive discovery requests.	.20	112.00
Kaminsky, E.	1/31/22	Review documents for privilege in response to request for production.	4.30	2,408.00
Kaminsky, E.	1/31/22	Confer with document vendor re privilege review and privilege log logistics re request for production.	.50	280.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	1/31/22	Research Rules of Civil Procedure re privilege review of documents in response to insurers' request for production.	.90	504.00
Turner, C.	1/31/22	Continue research re experts for MDL and non-MDL cases.	2.80	560.00
Agwu, I.	1/31/22	Complete reviewing first batch of claims for POC PI claim review.	10.00	2,000.00
Project Total:			1,172.20	\$ 738,759.50
TOTAL CHARGEABLE HOURS			1,317.00	
TOTAL FEES				\$ 931,224.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	90.70	1,800.00	163,260.00
Quinn, K.	4.10	1,250.00	5,125.00
Shore, R.	76.60	1,450.00	111,070.00
Holland, P.	2.10	290.00	609.00
Hudson, J.	31.60	785.00	24,806.00
Hansen, K.	30.60	360.00	11,016.00
Girgenti, J.	130.30	365.00	47,559.50
Grim, E.	2.00	775.00	1,550.00
Rubinstein, J.	96.90	850.00	82,365.00
Wolf, D.	9.90	775.00	7,672.50
Jones, T.	41.00	315.00	12,915.00
Rush, M.	94.30	700.00	66,010.00
Martinez, S.	10.30	325.00	3,347.50
Johnson, K.	32.30	240.00	7,752.00
Bonesteel, A.	22.70	375.00	8,512.50
Gaske, A.	73.90	610.00	45,079.00
Leveridge, R.	95.30	1,450.00	138,185.00
Ogrey, S.	9.50	240.00	2,280.00
Fastenau, L.	26.20	325.00	8,515.00
Farra, A.	8.20	710.00	5,822.00
Carey, C.	69.80	475.00	33,155.00
Sraders, S.	53.50	610.00	32,635.00
Colcock, S.	6.80	350.00	2,380.00
Kaminsky, E.	102.30	560.00	57,288.00
Turner, C.	12.90	200.00	2,580.00
Hubbard, B.	58.20	425.00	24,735.00
Agwu, I.	125.00	200.00	25,000.00
TOTALS	1,317.00		\$ 931,224.00

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TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	16.20	11,044.00
A004	Case Administration	11.10	2,382.50
A006	Employment / Fee Applications	2.10	609.00
A009	Meetings / Communications with AHC & Creditors	45.60	68,240.00
A019	Plan of Reorganization / Disclosure Statement	69.80	110,189.00
A020	Insurance Adversary Proceeding	1,172.20	738,759.50

EXPENSE DETAILS

E118: Litigation Support Vendors

Date	Description	Task	Amount
11/30/21	Contracted Professional Fees / Cobra Legal / Tech Time and Hosting Fees / eDiscovery vendor / 11/01/2021 - 11/30/2021	E118	2,000.53
12/31/21	Contracted Professional Fees / Cobra Legal / Tech Time, Licenses and Hosting Fees / eDiscovery vendor / 12/01/2021 - 12/31/2021	E118	5,402.28
1/31/22	Contracted Professional Fees / Cobra Legal / Tech Time, Licenses and Hosting Fees / eDiscovery vendor / 01/01/2022 - 01/31/2022	E118	6,842.37
Sub-Total of Expenses:			\$ 14,245.18

E119: Experts

Date	Description	Task	Amount
1/24/22	Professional Services - Gnarus Advisors LLC - Expert - Services rendered through 8/31/21	E119	11,631.50
Sub-Total of Expenses:			\$ 11,631.50

TOTAL EXPENSES **\$ 25,876.68**

TOTAL FEES AND EXPENSES **\$ 957,100.68**